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ABSTRACT

This report evaluates how school districts across the United States have provided services to immigrant and refugee students under two federally-sponsored programs: the Transition Program for Refugee Children, and the Emergency Immigrant Education Act. The evaluation first describes the population served and the federal, state, and local administration of the two programs, then presents overall conclusions about both programs. Among these conclusions are the following items: (1) the number of eligible immigrant students in the United States has been rapidly increasing; (2) the Refugee Program served a much smaller number of students than did the Immigrant Program; (3) although Congress appropriated approximately $30 million per year for the Immigrant Program, the increasing number of eligible students has reduced the per-student grant amount each year; (4) districts and states vary in the procedures used for counting students in both programs, with consequent variation in the quality of data collected; and (5) refugee and immigrant students have strong linguistic and acculturation needs. Pro and con arguments are also presented for each of four federal policy options for the U.S. Department of Education to consider in the further planning of these programs. Appendices provide application, reporting, and monitoring forms; and a list of school districts reporting eligible students for 1989-91 by state. (Contains 15 tables, 30 references, and a 43-item bibliography.) (GLR)

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An Evaluation of Two Education Programs Serving Refugee and Immigrant Students

FINAL REPORT

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An Evaluation of Two Education Programs Serving Refugee and Immigrant Students

FINAL REPORT

1993

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Prepared for:

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by COSMOS Corporation

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EXECUTIVE SUMMARY

This report evaluates how school districts across the United States have provided services to immigrant and refugee students under two federally-sponsored programs. The first is the Transition Program for Refugee Children (hereafter called the "Refugee Program"), and the second is the Emergency Immigrant Education Act (hereafter called the "Immigrant Program"). The evaluation describes the population served and the Federal, State, and local administration of the two programs, then arrives at overall conclusions about the two programs.

A. Description of Program Operations

The Immigrant Education Program. The Emergency Immigrant Education Act was reauthorized under Title IV, Part D, of the Hawkins-Stafford Elementary and Secondary School Improvement Amendments of 1988 (20 U.S.C. 3121-3130). The Immigrant Program provides annual grants to eligible state education agencies (SEAs) and local education agencies (LEAs) to provide supplementary educational services, provide in-service training for education personnel who work with the immigrant children, and pay for the costs of additional basic instructional services that are directly attributable to the presence of immigrant children in the school district. These include: (1) the costs of providing classroom supplies, (2) overhead costs, (3) costs of construction, (4) acquisition or rental of space, and (5) transportation costs.

The Refugee Education Program. The Transition Program for Refugee Children was authorized under the Refugee Act of 1980, Section 412, as amended by the Refugee Assistance Act of 1986. Prior to its phase out after the 1989-90 school year, the Refugee Program authorized SEAs to apply for grants to assist their LEAs in providing supplementary educational services to eligible refugee children. These services typically would include special English-language instruction, bilingual education, remedial instruction, testing for needs assessment, and guidance and counseling services. The program also authorized in-service training for education personnel and the parents of eligible refugee children. A program of discretionary grants to fund development and dissemination projects, also authorized under the Refugee Program, was never used and eventually was eliminated.

Congressional Funding. Each year the U.S. Congress appropriates funds for the operation of the Immigrant Program and, until FY1990, the Refugee Program. Since the inception of the Immigrant Program in 1984, Congress has appropriated approximately $30 million each year for the program. In FY1989, Congress appropriated $29,640,000 for the Immigrant Program and $15,808,000 for the Refugee Program. The next fiscal year, the Immigrant Program received an appropriation of $30,144,000 (an increase of 1.7 percent) while funding for the Refugee Program was eliminated entirely. In FY1991, Congress appropriated $29,276,619--a decrease of 2.9 percent from the previous year due to the across-the-board budget cuts required by the Budget Deficit Reduction Act. Once Congress makes its appropriation, the Office of Bilingual Education and Minority Language Affairs (OBEMLA), U.S. Department of Education, is responsible for distributing and monitoring the grant funds. The Immigrant Program is up for reauthorization in 1993.

Federal Administration. The Immigrant Program is administered by the Division of State and Local Programs, OBEMLA. Within the Division, a program manager is responsible for distributing application materials to SEAs, processing the returned applications, determining state allocations, and providing technical assistance to SEAs. As SEAs call or write for application packets, the program manager sends them a package and is available by telephone to answer any questions from SEAs concerning eligibility or the application process.

Once applications are received, they are processed by the program manager. The processing includes a check of State eligibility, computation of the grant amount, and handling payment authorizations. If the number of eligible students in a State increases dramatically from one year to the next, the program manager will request verification from the SEA that the reported numbers are correct.

Once all applications have been received and the SEAs' eligibility established, the program manager computes the amount each SEA is to receive. First, the program manager multiplies the number of eligible students in each State by $500 (the amount authorized by Congress) to determine the grant amount authorized for that SEA. This preliminary allocation is then reduced by the amount received under any other federal program for educational services for the same students based on their immigration status. The program manager then reduces the adjusted allocation to conform to the amount of the actual congressional appropriation for that year.

After the grant awards have been made, the Immigrant Program requires little Federal administrative activity. The program manager responds to written and telephone inquiries from SEAs concerning allowable expenditures and statutory and regulatory requirements. Occasionally, the program manager receives calls from LEAs with questions, but the callers are referred to the appropriate SEA program coordinator. No site visits are made to grantees or subgrantees for purposes of reviewing program files or observing services provided. The only monitoring activity required under program regulations is the review of bi-annual reports.

During its existence, the Refugee Program was administered by the same office and same program manager as the Immigrant Program. The application process and review process were the same as for the Immigrant Program except there was no reduction in SEA grants for other Federal funding received for the same purposes. After the grant awards were made, the only monitoring of the program by the program manager was the review of any reports voluntarily submitted by SEAs. No site visits were made to grantees or subgrantees for purposes of reviewing program files or observing the services being provided. No information was collected regarding the funds expended by grantees, and, consequently, there was no evaluation of expenditure patterns or program outcomes. The program manager did respond to telephone and written inquiries from SEAs and LEAs regarding applications, funding status, or the technical requirements of the program. There was no formal program of technical assistance to LEAs.

State Administration. SEAs administer the Immigrant Program grant through the same office that administers Title VII and other bilingual education programs. One Immigrant Program coordinator is responsible for most of the administrative activities for the grant, although budget and clerical support frequently are provided by other specialists in the SEA. Recently submitted biennial reports for 1988-89 and 1989-90 by SEAs show that SEAs use an average of approximately 1.3 percent of the grant for State administration of the Immigrant Program. Under Section 4404 of the authorizing statute, SEAs are allowed to withhold up to 1.5 percent of the grant amount for "proper and efficient administration of its functions" (20 U.S.C. 3124). Eleven of the 31 SEAs reporting for 1988-89, and 12 of the 31 SEAs reporting for 1989-90 did not withhold grant funds for SEA administrative use but, instead, passed the entire amount through to their LEAs. For 1989-90, nine of the SEAs withheld the total 1.5 percent, while four SEAs exceeded the 1.5 percent cap in FY 1990. The remaining SEAs withheld varying percentages between 0 and 1.5 percent.

The Refugee Program was administered at the SEA level by a sole program coordinator, often the same staff person who administered the Immigrant Program. Each SEA had a Refugee Program coordinator who was responsible for sending subgrant application materials to all LEAs, reviewing the returned applications, distributing the grant funds, providing technical assistance, and monitoring the LEA use of funds. Under Refugee Program regulations, SEAs were allowed to withhold up to 1 percent of the grant amount for purposes of State administration of the grant. Of the 42 SEAs receiving grants, seven did not withhold any funds for the State administration. SEAs withholding funds used funds for salaries, travel, computers, space, telephone, supplies, and indirect costs. Local Administration. LEAs administer their Immigrant Program subgrants through a district-level office established to handle several Federal- and/or State-funded programs. These programs usually provide bilingual, English as a Second Language (ESL), or other compensatory services funded under federal programs such as Title VII (Bilingual Education), Chapter I, or special State programs. The coordinator for ESL or bilingual education typically will also serve as the LEA's coordinator for the Immigrant Program. The role of Immigrant Program coordinator is a part-time responsibility, except perhaps in the largest districts. The ESL coordinator attends to Immigrant Program matters as needed, e.g., conducting the annual census or approving expenditures of program funds.

During the 1989-90 school year, the Refugee Program was administered by LEAs through the same district office that administered other bilingual or language minority programs. At the local level, a variety of staff were involved in program activities, usually supervised by an overall program coordinator. The Refugee Program coordinator also served as coordinator for the Title VII Bilingual, the ESL program, and Chapter I. The coordinator was responsible for non-teaching aspects of the program, such as submitting grant applications, discussing program operations with SEA staff, and arranging non-instructional support services for students. Teachers were primarily responsible for determining program priorities, conducting the annual count of refugee students, and selecting or developing instructional materials. Teachers and other instructional staff shared responsibility for assessing student needs, and the LEA financial staff maintained the financial records of the program's activities.

Program Outcomes. Little information about program outcomes is reported at the SEA level. The Immigrant Program was amended in FY1988 to require biennial reports from SEAs on program expenditures and numbers of students by country of origin. In these reports, no information is included on specific program outcomes such as changes in test scores or school performance for immigrant students receiving Immigrant Program services.

The information reported by SEAs on the country of origin for immigrant students documents three important characteristics of the Immigrant Program: (1) There is substantial variation among SEAs in the number of countries represented in their immigrant student population, (2) the proportion of students in the Immigrant Program from any one country can change substantially from year to year, and (3) immigrant students come from 171 different countries. These findings are in keeping with complaints from LEAs that the difficulty in serving immigrant students is more a result of having to deal with the numbers of different countries and language groups than with the absolute number of immigrant students.

B. Conclusions About the Programs

1. The number of eligible immigrant students in the U.S. has been rapidly increasing. In 1989 there were an estimated 700,000 immigrant students eligible for the Immigrant Program. Approximately 564,000 (85 percent) were in 529 school districts that received EIEA funding. The remaining 15 percent of eligible students were in districts that (1) did not meet the Immigrant Program's minimum size of 500 students or 3 percent of the total student population, or (2) chose not to apply for funding. In 1990, the number of eligible immigrant students in districts receiving EIEA funding increased 6.8 percent to 602,178. In 1991, the number of eligible students increased 14.1 percent to 687,334. The number of eligible immigrant students actually receiving services is reported in biennial reports to Congress.

2. The Refugee Program served a much smaller number of students than did the Immigrant Program. In the 1989-90 school year--the final year of operation--there were approximately 74,229 refugee students in 410 school districts that received TPRC funding. Congress appropriated $15,808,000 for the program that year, and the per-student grant amount was approximately $213. The number of eligible refugee students actually receiving services is not known because SEAs did not report the number to OBEMLA.

3. The school districts receiving funding under one program often did not receive funding under the other program. To be eligible for TPRC funding, a district had to have a minimum of 20 eligible refugee students. Because of the difference in eligibility requirements and minimum size between the programs, there were 270 school districts in 1989 that received funding from the Refugee Program but not the Immigrant Program. There were 398 districts that received funding from the Immigrant Program only. There were 140 school districts that received funding under both the Refugee and Immigrant Programs. In 1990--the year following the end of the Refugee Program--only 27 districts that received funding only under the Refugee Program in 1989 qualified for funding under the Immigrant Program. It is important to note that while all refugee students are also immigrants, only a small percentage of immigrant students are refugees.

4. Although Congress appropriated approximately $30 million per year for the Immigrant Program, the increasing number of eligible students has reduced the per-student grant amount each year. In 1989, the per student grant amount was approximately $62; in 1990 it fell to approximately $50; and in 1991, it fell again to approximately $43. School districts with a stable enrollment of immigrant students have experienced a loss of funds for serving those students. Districts with an increasing immigrant student enrollment have been experiencing steady or increasing funding but for a much larger number of students.

5. Districts and states vary in the procedures used for counting students in both programs, with consequent variation in the quality of data collected. However, the total number of immigrant students served by the Immigrant Program is less than the total number of eligible immigrant students nationwide because of the minimum size threshold for the program.

6. Both the Immigrant and Refugee Programs are striking in their diversity of students. Although refugees come from a very small number of countries

(eleven eligible countries in 1989), immigrant students come from more than 160 countries. Some arrive with strong education backgrounds, while others arrive having had little formal education. Some have strong English language skills; others are not even literate in their native language. Some have arrived through peaceful transition, and their families are intact; others have had long tragic journeys and are separated from their relatives. It is very difficult to make generalized statements about these students or draw conclusions for the overall immigrant student or refugee student populations. Immigrants from different parts of the world have very different experiences and needs. It is a challenge for the school district to try to meet the diversity of those needs. Districts often are confronted with far more language groups than they can support even with bilingual aides. The numbers of students from any one country or language group are often too small to warrant a separate class, so students from several countries are placed together in classes. Large districts often have the necessary additional resources and numbers to have successful bilingual programs.

7. LEAs do not operate distinct programs for only refugee or immigrant students; instead, these students are included in the districts' larger programs for LEP students. The immigration status of refugee and immigrant students is important for purposes of collecting funds and for tracking services to those students. The designation as a refugee or immigrant, however, tends to disappear once students have been counted in the census and funds have been received. Thereafter, the students tend to be treated as part of the district's bilingual or ESL program and taught along with other LEP students. Consequently, the materials purchased, aides hired, etc., are used for all students in the LEP class, not just immigrants or refugees. Thus, the program regulations governing Title VII, Chapter I, or State funding for LEP students much more strongly affect the kind of education students receive.

8. Refugee and immigrant students have strong linguistic needs and strong acculturation needs. The LEAs tend to serve the linguistic needs through formal ESL programs while serving acculturation needs through counseling and other support services. ESL teachers will instruct students in English and other subjects during the regular school day and summer school. Counselors and ESL teachers deal with the students' physical, emotional, and cultural needs through daytime sessions, after-school programs, and evening meetings with parents and the community. The academic and support needs of immigrant and refugee students still exceed the LEAs' capacity to meet those needs. LEAs have established language training as the most critical need and have allocated resources accordingly. However, the other needs of the students (and parents) are not being met with existing resources.

9. LEAs used the funding from either program to purchase resources on a one-time and marginal basis. Districts do not consider program funding, at an average of $43 per immigrant student or $213 per refugee student for the year, to be either reliable or consistent in grant amount. Because of the flexibility in the use of funds, they are used to purchase items not allowable under other programs, such as Title VII and Chapter I. They also are used to make one-time purchases such as textbooks, pay for field trips, or hire temporary classroom aides. Even in districts with large immigrant and/or refugee student populations, the uncertainty of the program from year to year and the inability to offer permanent employment makes it difficult to hire the best people.

10. The two programs are administered in very similar ways, and the funds are used for similar kinds of purchases. Districts use the funds to purchase textbooks, supplemental materials, to pay teacher aides, and for transportation. Few districts used the program funds to construct facilities, although some districts used either Immigrant or Refugee Program funds to rent additional classroom space. Many school districts had the same personnel administer both programs.

11. In the Immigrant program, although LEAs conduct their count of eligible students in March, they are not given formal notification of whether and how much their grant amount will be until November. LEAs find budgeting difficult because they are uncertain whether the program will be funded each year and whether funds will be adequate. In addition, grant payments often arrive after the start of the school year. The annual student count is conducted in March and submitted to the SEA by April. The SEA applications are submitted to OBEMLA in May, and SEAs are notified of their grant awards between June and September. SEAs then send the subgrant application materials to LEAs in September, and the LEAs submit their formal request for grants and their plans in October. The SEA reviews the plans and finally notifies the LEA in November of the amount of its grant. Thus, LEAs do not start planning for the use of the funds until receiving written notification well into the school year. Most districts do activity and curriculum planning in late spring for the following academic year.

12. The teachers and administrators serving immigrant and refugee students have been both creative and resourceful in operating the two programs. LEA staff have been successful in using Immigrant and/or Refugee Program funds in concert with funding from other Federal and State programs to provide a broad array of instructional and support services for eligible students. Instructional services range from native language immersion to integrated mainstreaming to cultural enrichment programs. Support services range from parent outreach to job placement to bilingual counseling. LEAs have also modified their administrative practices to include dedicated multicultural schools, strategic planning, and administrative offices dedicated to multicultural programs. LEA staff have planned their programs for serving immigrant and refugee students and then found ways to draw from EIEA, TPRC, Title VII, Chapter I, and other funding sources to make the programs a reality. And when Federal, State, or local funding was not available, staff reached into their own pockets to pay for the necessary expenses.

C. Federal Policy Options

There are at least four policy options for the U.S. Department of Education to consider in the further planning for the Immigrant and Refugee Programs.

Option 1. Because immigrant and refugee students usually are served as part of a district's LEP population, the Department should consolidate the programs with another, larger Federal program (e.g., Title VII) to reduce administrative costs.

Arguments in favor. Immigrant and refugee students clearly are treated separately from other LEP students for purposes of the annual student count for each of the two programs. However, once the students enter the classroom, refugees and immigrant students are provided the same instructional services as other LEP students. Teachers and program administrators do not think it is necessary or desirable to focus attention on the student's immigration status. Rather, they focus attention on the cultural background of all LEP students to reinforce the multicultural reality of the world that all students (including U.S. citizens) will be facing. Program coordinators and other district staff administer the two programs in a very similar fashion in the way the student counts are conducted, making similar kinds of purchases of instructional materials or classroom aides, and student assessment.

Arguments against. While the administration of the Immigrant and Refugee Programs are similar--and similar to other ESL programs for LEP students--the existence of discrete programs serves an important function. By being separate, the Immigrant and Refugee Programs formally recognize the needs of a growing group of students. Immigrant and refugee students have additional education and support needs than do other LEP students because of the recency of their arrival, lack of exposure to formal education, the emotional trauma of escape or family separation, the lack of preparation for immersion in a foreign culture, and the lack of an established support network outside the school. The investment of additional resources to help a refugee or immigrant student when he or she first arrives may deter the student from gang or other undesirable behavior later which will cost the public even more to correct.

Furthermore, the establishment of separate programs for immigrant and/or refugee students is an important way of publicly acknowledging the unusual set of circumstances and needs that these students have. This recognition gives local LEP/ESL program staff the credibility for requesting yet other State and local resources for serving these students.

Option 2. Change the definition of eligible immigrant or refugee students to recognize the number of years it actually takes these students to become language proficient and acculturated.

Arguments in favor. The current eligibility definition allows immigrant and refugee students to be served in the program only if they have been in the U.S. three years (two years for an elementary refugee student) or less. The length of time in the country is a much simpler criterion to administer and avoids the potential controversy regarding which tests shall be used to measure proficiency and at what grade levels.

Arguments against. LEAs report that it often takes six or seven years for an immigrant student to learn enough English to be mainstreamed and become adjusted to American culture. Severe emotional problems or educational deficiencies cannot be corrected in just three years, yet after three years the students are no longer eligible for services. Once the student passes the three-year mark, he or she is still in the LEP program but no longer has additional resources supporting him or her. The sudden loss of support can have an adverse effect on the student's academic progress and may lead to behavior problems.

Option 3. Continue to distribute program funds on a formula basis rather than shift to discretionary funding.

Arguments in favor. Discretionary funding for both programs has important implications for which school districts would receive funding. If school districts were to apply for Immigrant or Refugee Program funding the same way they apply for Title VII grants, then those districts with experienced grant writers and established reputations would be most likely to receive funding. For example, one of the 15 LEAs visited as part of this study had applied for Title VII funding for three consecutive years. In spite of having what appears to be a very effective program for serving immigrant students, they have been turned down for Title VII funding all three years. Awarding Immigrant Program grants on a competitive application basis may have resulted in this district's having received no funding and in turn having to cut critical instructional and support services to its immigrant students.

Arguments against. Congressional funding has been relatively constant for the last three fiscal years while the number of eligible students has increased. The net effect of this has been to reduce the per-pupil grant amount from approximately \$62 in FY1989 to \$50 in FY1990 and to \$43 in FY1991. At some point the U.S. Department of Education must determine the minimum per-pupil grant necessary to continue an effective program (such a calculation was outside the scope of this evaluation). If program funding does not allow the minimum threshold funding for all eligible districts, funding should be awarded to those districts presenting the best ideas and plans for serving immigrant students.

Option 4. Require greater accountability by SEAs for reporting outcome measures of student achievement and performance for immigrant and refugee students being served under these programs.

Arguments in favor. The SEA and LEA respondents interviewed and surveyed for this evaluation believed that both programs had a significant impact on the education of immigrant and refugee students. Outcome measures of student achievement and performance for those students, however, were not readily available at the LEA, SEA, or Federal levels. Under the current Immigrant Program, States are required to report only on two process indicators: country of origin and grant expenditures by category. There is some evidence that LEAs do evaluate LEP students' academic progress on standardized tests and regular classroom exams, but there has been little systematic analysis of these measures for immigrant students as a distinct group at any level. Thus, the effectiveness of the Immigrant and Refugee Programs for improving academic performance cannot be determined at this time. OBEMLA has the authority to establish its own format for the annual performance report required under existing Education Department General Administrative Regulations (EDGAR) and can notify the SEAs of that format.

Arguments against. Immigrant students receive only a small proportion of their instruction through services funded by the two programs. The large number of intervening factors and the absence of standardized testing across SEAs and LEAs means that additional efforts by SEAs would not yield more conclusive outcome data. Available anecdotal evidence is sufficient to show the programs have important support service outcomes for students.

I. IMMIGRATION AND ITS IMPACT ON THE EDUCATIONAL SYSTEM

I. IMMIGRATION AND ITS IMPACT ON THE EDUCATIONAL SYSTEM

A. Introduction

Each year, thousands of school-age immigrant children arrive in the United States seeking a better life. Some are like Somxai and Souphanh Noum, a teenage brother and sister who spent seven years in a refugee camp in Laos waiting for resettlement in another country. After six years with no education in the camps, Somxai and Souphanh were given several months training in "survival English" to prepare them for life in a new land with a new culture.

Others are like Swetlana Borishkevich, a teenage Ukrainian girl who had attended regular classes in the Soviet Union through the eighth grade, but who had not gone on to vocational training in the Soviet Union because she fled with her family to Italy. Swetlana now must learn a new language in order to accomplish even the simplest class assignments.

Still more are like Jose Cardenas, a Mexican immigrant who came to the United States with his uncle and who had occasional schooling in his home country but spent most of his time helping on the family farm. Although 16 years old, Jose only has completed the third grade. Jose's eight-year-old brother Manuel, who also came to this country with his uncle, has never been to school.

Finally, there is Soo Jung Chu who transferred from his Korean school to a U.S. school with only a basic knowledge of English but a strong academic background.

Whereas Swetlana came to this country with her family, Somxai and Souphanh have been separated from their family for many years and are not even sure if they are still alive. But unlike Soo Jung Chu, who is now living with a sponsoring family in which the father works and the mother is home full-time, Jose and Manuel are left alone much of the day because their uncle must work to support the family.

Although these immigrant children each come from very different backgrounds and find themselves in very different living situations in their new homeland, all share one common characteristic: They are to be enrolled in a public school. Each year, thousands of new immigrant children arrive at local schools in need not only of traditional education, but also English language skills, and medical, emotional, and social service assistance. Since the early 1800s, public schools have been coping with the influx of immigrant students and attempting to serve them within the resources available to the district.

This report evaluates how those districts have provided services under two federally sponsored programs. The first is the Transitional Program for Refugee Children (hereafter called the Refugee Program) and the second is the Emergency Immigrant Education Act (hereafter called the Immigrant Program). The evaluation describes the Federal, State, and local administration of these programs, as well as the students each program has served in recent years. The evaluation also identifies the major outcomes from each program and arrives at overall conclusions about the value of the programs.

1. The Immigrant Education Program

The Emergency Immigrant Education Act (EIEA) was reauthorized under Title IV, Part D, of the Hawkins-Stafford Elementary and Secondary School Improvement Amendments of 1988 (20 U.S.C. 3121-3130). The Immigrant Program provides annual grants to eligible State education agencies (SEAs) and local education agencies (LEAs) to provide supplementary educational services and in-service training for education personnel who work with the immigrant children, and to pay for the costs of additional basic instructional services that are directly attributable to the presence of immigrant children in the school district. These include: (1) the costs of providing classroom supplies, (2) overhead costs, (3) costs of construction, (4) acquisition or rental of space, and (5) transportation costs. In FY1991, approximately $29,277,000 in program funds were distributed to 31

SEAs and 515 LEAs. Approximately 685,586 immigrant children were eligible for the program. Current enabling legislation and program regulations can be found in Appendix A.

To be eligible for EIEA funding, a school district must have a minimum of 500 eligible immigrant students, or eligible immigrant students must comprise at least 3 percent of the total student enrollment. Immigrant students are children who were born outside of the United States, Puerto Rico, District of Columbia, Guam, American Samoa, the Virgin Islands, Northern Mariana Islands, or the Trust Territory of the Pacific Islands. The term includes only children who are not U.S. citizens, or who are:

- Lawful resident aliens; or
- Undocumented resident alients; or
- Refugees; or
- Asylees; or
- Parolees; or
- Persons of other immigration status.

Furthermore, immigrant students are eligible only if they have been attending public or non-profit private schools for fewer than three complete academic years and were enrolled during the current academic year. Specifically excluded from EIEA program eligibility are:

- Children of foreign diplomats; or
- U.S. citizens' children born abroad; or
- Children of foreign residents who are temporarily in the U.S. for business or pleasure; or
- Students who have a residence in a foreign country.

2. The Refugee Education Program

The Transition Program for Refugee Children (TPRC) was authorized under the Refugee Act of 1980, Section 412, as amended by the Refugee Assistance Act of 1986. Prior to its phase out after the 1989-90 school year, the Refugee Program authorized SEAs to apply for grants to assist their LEAs in providing supplementary educational services to eligible refugee children. These services typically would include special English-language instruction, bilingual education, remedial instruction, testing for needs assessment, and guidance and counseling services. In-service training for education personnel and parents of eligible refugee children also was authorized under the program. A program of discretionary grants to fund development and dissemination projects, also authorized under the Refugee Program, was never used and eventually was eliminated.

Each State that applied for a grant under the Refugee Program was required to have an approved plan for the administration of refugee resettlement programs on file with the U.S. Department of Health and Human Services, Office of Refugee Resettlement (ORR). Program funding was by formula and based on weighted SEA and LEA counts of the number of eligible refugee children enrolled in the State or local district. To be eligible under TPRC, children had to have official refugee status as noted on their (or their parents') Alien Registration Cards (I-94 card) from the Immigration and Naturalization Service (INS). Eligible students had to be enrolled in public or non-profit private elementary or secondary schools. Elementary students cannot have been in the United States for more than two years, and secondary students cannot have been in the U.S. for more than three years. The length of time a student has been in the U.S. is established by the issue date on the I-94 card. In 1989, children from the following countries were eligible for refugee status and for TPRC services: Afghanistan, Cambodia, El Salvador, Ethiopia, Laos, Poland, Romania, Soviet Union, Thailand, Vietnam, and Yugoslavia. A school district had to have at least 20 eligible refugee students to be eligible for TPRC funding. Congress appropriated approximately $15 million annually for the program until FY1989, after which the program was not reauthorized.

B. Immigration Trends in the United States

As one component of population growth in this country, levels of immigration change over time, according to external and internal conditions and policies. Three categories of legal immigrants are generally recognized: numerically limited immigrants; exempt, immediate-relative immigrants; and refugees. Levels of immigration historically occur in waves. Three major cohorts of immigrants came to the United States in the early 1880s, the early 1900s, and the late 1960s. The numbers and ethnic and linguistic characteristics of the immigrants comprising these three cohorts were different for each period and illustrate the changing needs and nature of the immigrant population. Immigrants in the first two cohorts were largely from Europe. The first cohort, however, was distinguished by the predominance of English speakers and its ethnic similarity to the American population of the 1880s. More immigrants arrived during the second wave than in any other earlier period. In one decade, more than 8 million entrants, representing more than 40 nations, came to the United States (NCAS 1988). The third cohort, which continues today, has brought many immigrants from new countries of origin to the United States and represents unprecedented growth in the foreign-born population in this country. During the 1980s, more than half a million legal immigrants arrived each year (Passel, 1986; Haney, in NCAS, 1988). These new immigrants come largely from Mexico, Asia, Central and South America, and the Caribbean.

In addition to the number of legal immigrants, a large number of undocumented immigrants also have entered the country during this period.

Estimates during the 1980s have placed the annual undocumented immigrant population from between approximately 200,000 (Haney, 1987) to half a million (Reubens, in Passel, 1985). These figures contribute to an estimated total of between 14 million and 15 million immigrants in the United States during the mid-1980s (Passel, 1986; Haney, in NCAS, 1988).

1. Characteristics of Immigrants

As mentioned, the most recent cohort of immigrants comes primarily from Mexico, Asia, Central and South America, and the Caribbean. According to INS data, the percentage distribution of legal immigrants between 1981 and 1989 is estimated to be 43 percent from Asia; 25 percent from the Caribbean and Central and South America; 17 percent from Mexico; 10 percent from Europe; almost 3 percent from Africa; and 2 percent from other countries (U.S. Department of Commerce, 1992). However, about 44 percent of all legal immigrants in 1990 were from Mexico, 23 percent from the Caribbean and Central and South America, 22 percent from Asia, 7 percent from Europe, 2 percent from Africa, and 2 percent from other countries.

The geographic distribution of immigrants in this country in 1980 was documented as follows: 28 percent in California; 16 percent in New York; 9 percent in Texas; 8 percent in Florida; 6 percent in Illinois; 4 percent in New Jersey; 3 percent in Massachusetts; 2 percent in Pennsylvania; 2 percent in Michigan; 1 percent in Ohio; and 21 percent in the remaining 40 states (U.S. Census, 1980). The average age of the recent immigrant population is notably lower than the mean age (30) in the United States. Similarly, some recent groups of immigrants appear to possess a higher proportion of college degrees than immigrants in previous waves (Muller and Espenshade, 1985). Although the number of educated immigrants in these groups is increasing, larger groups of poorly educated immigrants from other parts of the world also are arriving. "Immigrants in recent waves have fewer skills, lower earnings, higher poverty rates, and higher welfare use than those in earlier waves at similar stages....In 1980, for example, less than 3 percent of Mexican immigrants had college degrees, and two-thirds had no high school education" (Borjas, from Lochhead, 1990).

2. Undocumented Immigration

Although data are available on settlement, age distribution, and educational background of legal immigrants, the numbers may be somewhat misleading because of the absence of data on undocumented immigrants. The 1980 Census Analysis shows the impact of these numbers on the above breakdowns. Passel reports that the Census count for 1980 included at least 2,057,000 undocumented immigrants. Approximately 55 percent of these immigrants come from Mexico, and when combined with the rest of Latin America and the Caribbean, the total number of undocumented immigrants from these countries increases to approximately 77 percent of the total. Areas of settlement for all undocumented immigrants are concentrated (80 percent) in five states--California, New York, Texas, Illinois, and Florida--with California accounting for half of the total. The report also says that approximately 67 percent of all undocumented immigrants are under 29 years of age (Passel, 1986).

C. Challenges for Immigrants in the United States

When the numbers of legal and undocumented immigrants are combined, the annual immigrant population nearly doubles. Many of these individuals arrive in this country already having endured wars, political struggles, or economic and other hardships in their own countries. Once in the United States, the economic struggle often continues and is frequently intensified by the search for appropriate housing and suitable employment. Immigrant youth who are separated from their families, or faced with the responsibility as heads of their households, are under multiple pressures when trying to work and go to school. These pressures are increased for those immigrants who arrive with limited or no proficiency in English.

Schools are especially important in providing new immigrants with their first introduction to American customs, practices, and expectations. It is also in school that many immigrant students face obstacles and achieve success. The most recent cohort of immigrants, who are from a largely non- or limited-English-speaking population with very different ethnic cultures and family structures, are confronted by the challenges of adapting to the traditional American school system. The success of these immigrant children in school inevitably will serve to strengthen American communities and workplaces. The nation is slowly beginning to respond to the educational and social needs of these students, and effective educational practices already are being observed.

D. Impact on the Educational System

The educational system in the United States must respond on many levels to the growing immigrant student population. The concentration of immigrant students in large urban areas creates an influx of diverse foreign languages and cultures. These urban schools are challenged to teach English to immigrant students, who may first require a basic understanding of their own cultural practices and linguistic backgrounds. In addition, immigrant students may demonstrate social needs that require cultural sensitivity and/or bilingual assistance from their teachers or aides. The schools must respond equally to the diversity and number of cultures and languages that are represented in the total immigrant student population.

The family is an important unit in most Latin American and Asian cultures. A new challenge arises, however, for many immigrants when the family is separated or when the family's cultural practices are challenged by practices in American institutions, especially the schools. Teachers may not be able to get the support of parents in helping students with their educational development for a variety of reasons. In some cases, parents may not even be present in the United States. Even when parents are here, problems can be created by differing cultural practices, language barriers, lack of time for involvement, or unemployment. The potential for tension between immigrant youth and their families also exists when the children and their parents are at different phases in the process of acculturation. One consequence of the above obstacles can be the isolation of the immigrant parents from the school environment. The role of family in the Asian culture is illustrated by a school social worker/consultant in Seattle:

> The inculcation of guilt and shame are the principal techniques used to control the behavior of family members. Parents emphasize their children's obligation to the family. If a child acts independently (contrary to the wishes of his parents), he is told that he is selfish and inconsiderate and that he is not showing gratitude for all his parents have done for him. The behavior of individual members of an Asian family is expected to reflect credit on the whole family.... In summary, traditional Asian values emphasize reserve and formality in interpersonal relations, restraint and inhibition of strong feelings, obedience to authority, obligations of the family, high academic and occupational achievement, and use of shame and guilt to control behavior (Kang, 1991).

School districts that have contact with immigrant populations face tough decisions on how best to serve these groups, often without the necessary financial and human resources. Teachers must help their students overcome language deficiencies before regular instruction can take place. And even then, many immigrant students have never attended school in their own countries and are not at the academic grade that corresponds to their ages. Teachers must address these challenges, while at the same time attending to the full scope of needs and demands made by the rest of their students.

E. Overview of the Report

This report describes how school districts have used the Immigrant and Refugee Programs to meet the needs of the increasing number of foreign-born students entering their schools. This report describes the administration and services of the two programs. Section II of this report describes the methodology for collecting the data being reported. Section III describes the Federal administration of two programs, while Sections IV and V, in turn, describe the administration at the State and local levels. Section VI summarizes the effective practices implemented by 15 districts serving immigrant students, and the major findings from the evaluation are presented in Section VII. The operational description of the effective practices outlined in Section VI is presented in the 15 case studies contained in a separate volume, available on request from the Department.

Following Section VII are a Reference List and Bibliography. The publications listed under References are those which are specifically cited throughout the report. The Bibliography is comprised of general materials the reader may want to review for additional information.

The last half of this volume contains seven appendices. Appendix A presents a number of reporting forms used by the two programs. Appendix B lists all of the local school districts that reported eligible students for each program during the period 1989 to 1991.

II. STUDY METHODOLOGY

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The data used in this evaluation were collected using several different methodologies. First, a systematic review of literature on immigrant and refugee students was conducted early in the study and updated at the end of the study. Second, interviews were conducted with Federal officials knowledgeable about the Refugee and Immigrant Programs. Third, a telephone survey was administered to all State Refugee Program coordinators. Fourth, a mail survey was sent to approximately 400 LEAs that received Refugee Program funding in the 1989-90 school year. Fifth, case studies were prepared for 15 LEAs identified as having effective practices for serving immigrant students. Finally, the study team conducted a secondary analysis of the survey the General Accounting Office (GAO) had conducted of 522 LEAs receiving Immigrant Program funding. Because of the similarity between the GAO survey and the SEA/LEA surveys to be conducted by this evaluation, the U.S. Department of Education decided to forgo the proposed telephone and mail surveys for the Immigrant Program. In place of the two surveys, contract resources were reallocated to conduct the 15 case studies described above.

Each of these data collection methodologies is described below. Those readers interested only in the content of the data may want to skip to the next section.

A. Literature Review

At the beginning of the evaluation, the study team conducted a systematic literature review to identify articles, books, reports, and other materials that describe or evaluate the operation of the Refugee or Immigrant Programs. The review also scanned for materials describing the demographic characteristics of refugee and immigrant children as well as the experiences of refugee and immigrant children in adapting to U.S. schools. Because of limited project resources, the review focused within certain boundaries. It included only materials published after 1980 that describe experiences in U.S. schools and that deal with the targeting and operation (not curriculum content) of education programs.

The project team reviewed four main sources of literature:

- The Educational Resources and Information Center (ERIC) and Psychology Literature Abstracts (PSYCLIT) electronic databases;
- The databases maintained at the National Clearinghouse on Bilingual Education, the Refugee Service Center, and the Migration and Refugee Services of the U.S. Catholic Conference;
- The databases maintained at the Bureau of Census, the Immigration and Naturalization Service, and the National Center for Education Statistics; and
- The State applications, State plans, biannual reports, and other documents kept on file at the Office of Bilingual Education and Minority Language Affairs (OBEMLA) and the Office of Refugee Resettlement (ORR) of the U.S. Department of Health and Human Services.

The literature review produced limited information about the Refugee and Immigrant Programs. The lack of information is due to three factors:

- The State applications contained no information regarding program operation or services;
- The State plans at ORR contained no information regarding elementary or secondary education of refugees; and
- As of 1988, no Federal agencies had evaluated or audited either program, nor issued any annual reports.

The team did locate and review several articles describing services under the Refugee Program in New York City, and annual performance reports from California and Arizona.

B. Federal Interviews

In conjunction with the literature review, the study team conducted interviews with Federal officials who were knowledgeable about the Refugee and/or Immigrant Programs. The team developed a list of officials in those agencies likely to be affiliated with either program. Two selection criteria were used. First, the agency/office had to have direct involvement with either program, in a funding, operational, evaluative, or legal oversight capacity. Second, the respondent had to have working contact with either program, ideally including interaction with program officials. The list of officials interviewed is presented in Exhibit 1.

The study team developed a protocol to guide the interview with the Federal officials. The protocol included three types of questions: (1) the respondent's knowledge of the operation and utility of both programs, (2) the information collected, needed, or used by the agency, and (3) the respondent's perception of problems facing the Refugee or Immigrant Programs. The protocol used to conduct Federal interviews is presented in Appendix C.

Although the interviews clarified the operation of the two programs at the Federal level, they produced only limited information about services and impacts at the State education agency (SEA) and local education agency (LEA) levels. The lack of information at that time was due to three factors:

- The Federal application process requires only limited information from SEAs, and there was no verification by Federal staff of the information submitted;

Exhibit II-1

NAME AND AFFILIATION OF FEDERAL INTERVIEWEES

U.S. Department of Education

Harpreet Sandhu
EIEA Program Manager
Division of State and Local Programs
Office of Bilingual Education and Minority Language Affairs

John Chapman
Budget Analyst
Office of Planning, Budget and Evaluation

William McLaughlin
Assistant Inspector General
Policy Planning and Management Services
Office of Inspector General

Geraldine Jasper
Branch Chief
Elementary, Secondary, and Special Programs Branch
Office of Inspector General

Bill Wooten
Deputy Director (former)
Office of Bilingual Education and
Minority Language Affairs

Jonathan Chang
EIEA Program Manager (former)
State and Local Programs Division
Office of Bilingual Education and
Minority Language Affairs

U.S. Department of Health and Human Services, Office of Refugee Resettlement

Linda Gordon
Statistician

Trinh Ngoc Dung
Program Analyst

Office of Management and Budget

Phyllis Eisen
Budget Examiner
Education Branch

General Accounting Office

Fred Yohey
Assistant Director
Elementary and Secondary Education
Human Resources Program
General Accounting Office

U.S. Senate

Michael Myers
Counsel
Subcommittee on Immigration and Refugee Affairs
Judiciary Committee

Terry Hartle
Chief Education Advisor
Committee on Labor and Human Resources

U.S. House of Representatives

Ricardo Martinez
Legislative Analyst (former)
Committee on Education and Labor

- Prior to 1989, OBEMLA staff had not required SEAs to submit annual performance reports--or any other types of evaluations--due to the absence of guidelines for what those reports should contain; and

- Federal staff have only limited contact with SEAs--and virtually no contact with LEAs--regarding the two programs.

The project team expected to use the available information about SEA and LEA operations, services, and outcomes to refine the questions regarding those issues.

C. SEA Telephone Survey

The study team conducted a telephone survey of all State coordinators for the Refugee Program. The purpose of the survey was to collect information on the administration of the program at the State level and document outcomes from the use of program funds. Forty-two State coordinators were surveyed. The States surveyed were those that received Refugee Program funding in school year 1989-90, the program's final year. The surveys were conducted in spring of 1991 and were administered using a computer-assisted telephone interview (CATI) program. A copy of the telephone survey instrument is presented in Appendix D.

D. LEA Mail Survey

The study team conducted a mail survey of all LEAs that received Refugee Program funding during school year 1989-90. A list of all districts (N=400) receiving funding was obtained from OBEMLA and used as a master list of addressees. Mailing addresses for each district were obtained from an NCES database of all LEAs. The surveys were mailed in June 1991 and were returned by August 1991. Of the 400 surveys mailed, 244 (61 percent) were completed and returned by LEAs. The surveys focused on five topics: target population, characteristics of eligible children, program administration, program expenditures, and program outcomes. A copy of the mail questionnaire is presented in Appendix E.

The lower-than-expected response rate for the mail survey was due to two factors. First, the Refugee Program ended in the 1989-90 school year, and LEAs no longer were receiving funding at the time they were asked to complete the questionnaire. It is possible that without the perceived threat of loss of funds for not completing the questionnaire, many districts might have decided to ignore the request for information. Second, in follow-up telephone calls to many districts, local informants reported that there was turnover in the Refugee Program coordinator position at the end of the funding, and the coordinator was no longer with the LEA. The local informants, usually the bilingual coordinators, did not have any information or records on the program in their district.

E. Site Visits

The study team conducted 15 case studies of local school districts that operate effective programs for serving immigrant students. The purpose of the case studies is to document the services, outcomes, expenditures, and student characteristics of those programs so that other districts might replicate the successful practices. Data for the case studies were collected through site visits to each LEA. The site visits were designed to:

- Identify and document the range of practices that comprise LEA programs for serving immigrant students;

- Determine how those practices utilized resources from the Immigrant Program and other funding sources; and
- Document the practices in sufficient detail to enable other LEAs to replicate, or avoid, certain practices as they see fit.

The LEAs that were selected to be the subjects of case studies (1) had programs serving immigrant students, and (2) had to meet 10 or more predetermined characteristics. (These components are described in the introduction to Volume II.) In developing these characteristics, the study team conducted interviews with experts in the field of immigrant education, soliciting their recommendations for criteria to identify effective practices. Five state coordinators or spokespersons for Immigrant Education Programs were interviewed:

- William Adorno, Office Manager of the Office of Bilingual Education, California Department of Education, Sacramento, California;
- Clinteria Knight, Program Coordinator, Florida Department of Education, Tallahassee, Florida;
- Xavier Botana, Title VII Supervisor, Illinois State Board of Education, Chicago, Illinois;
- Martha Cruz, Long Island Supervisor, Division of Bilingual Education, Westbury, New York;
- Fidel Alvarez, Program Specialist, Texas Education Agency, Austin, Texas; and
- Paul Hill, Researcher, Rand Corporation, who is currently conducting a study for the Andrew W. Mellon Foundation on the challenges faced by school systems that must educate large numbers of immigrant children.

During interviews, the six experts shared their ideas for developing criteria to define effective immigrant education programs.

The team also solicited recommendations and comments from the following organizations:

- Office of Bilingual Education and Minority Language Affairs, U.S. Department of Education;
- School Recognition Program, U.S. Department of Education;
- U.S. General Accounting Office;
- National Coalition of Advocates for Students; and
- California Tomorrow.

The selection procedure for identifying sites included the following steps. First, the 15 States with the largest number of immigrant students were identified. Washington, D.C. and Hawaii were also included because in these jurisdictions there is a single LEA and close SEA/LEA coordination. Second, State Department of Education officials were contacted in each of these States and asked to identify five school districts within their State that use effective practices to serve immigrant students. Third, three experts in the field of immigrant education were contacted and asked to recommend school districts that successfully serve immigrant students. Finally, all nominated districts were screened using the site-screening instrument presented in Appendix F. This screening to collect information about the district and the immigrant education program was conducted by telephone.

After the site screenings were completed, site-selection was based on the following criteria:

- Number of Site-Screening Criteria Met. If a district met at least 11 of the 14 site-selection criteria, it was eligible for site-visit selection. However, judgments were not made based on the actual number of criteria that were met beyond this, i.e., if one district met all criteria, it was not to be considered better than a district that met 12 criteria.

- Population of Immigrant Students. The immigrant students' ethnicity or country of origin were considered when making site-selection decisions. For example, if three school districts with primarily South Vietnamese students already had been selected, then districts with students from the Soviet Union or Mexico were given additional consideration.

- Geographic Location. The region of the United States in which the school district is located was important to the site-selection decision. States with very large immigrant populations, such as California, Florida, and New York, were included. Diversity in geographic representation was also considered important.

- Particular Areas of Interest. If a district met all of the above criteria and had one component of its program for immigrant students that was considered important, it was eligible for selection. For instance, if a district had an excellent intake program or an innovative summer school, these were taken into account in the site-selection process.

The site visits included three types of activities: face-to-face interviews, review of documents, and direct observation of instructional and support services. The respondents interviewed during each site visit included the district superintendent, the district Immigrant Program coordinator, program instructors and other district support staff, eligible children, and parents of eligible children.

A copy of the interview guide used in the interview with the LEA program coordinator is presented in Appendix G. Similar interview guides were used with other LEA respondents.

The information collected during the field interviews (and other site-visit activities) was used to write the case studies found in Volume II of this report. Each case study describes the design, operation, and outcomes of each program in sufficient detail to enable other LEAs to use the case study as a guide for implementing similar programs. Section VI in this volume presents a cross-case analysis of the major practices identified.

F. Secondary Analysis of GAO Survey Data

The General Accounting Office (GAO) conducted a survey of 529 school districts that received EIEA funds in school year 1989-90 and a representative sample of school districts that did not receive EIEA funds. This survey was aimed at determining (1) how school districts use EIEA funds; (2) how many districts have EIEA-eligible immigrant students but receive no EIEA funds; and (3) how many EIEA students participate in other federally funded education programs. The results of the GAO study were published in Immigrant Education: Information on the Emergency Immigrant Education Act Program.

Because the GAO survey collected data about the Immigrant Program relevant to the current evaluation, and because all GAO survey data were not analyzed and reported, the study team decided to conduct a secondary analysis of the GAO survey data. GAO provided copies of the two survey databases (those districts getting funds and those districts eligible but not applying) to the study team. These data have been analyzed and, where relevant, have been included in the summary of program operations.

III. FEDERAL PROGRAM OPERATION

III. FEDERAL PROGRAM OPERATION

Each year the U.S. Congress appropriates funds for the operation of the Immigrant Program and, until FY1990, the Refugee Program. Since the Immigrant Program's inception in 1984, Congress has annually appropriated approximately $30 million for its support. In FY1989, Congress appropriated $29,640,000 for the Immigrant Program and $15,808,000 for the Refugee Program. The next fiscal year, the Immigrant Program received an appropriation of $30,144,000 (an increase of 1.7 percent) while funding for the Refugee Program was eliminated entirely. In FY1991, Congress appropriated $29,276,619--a decrease of 2.9 percent from the previous year due to the across-the-board budget cuts required by the Budget Reduction Act of 1989. Once Congress makes its appropriation, the U.S. Department of Education's Office of Bilingual Education and Minority Language Affairs (OBEMLA) is responsible for distributing and monitoring the grant funds. This section describes the Federal administration of the two programs.

A. Program Administration and Expenditures

1. Immigrant Program

The Immigrant Program is administered by the Division of State and Local Programs, OBEMLA. Within the Division, a program manager is responsible for distributing application materials to SEAs, processing the returned applications, and providing technical assistance to SEAs. The program manager also is responsible for administering other Federal programs, e.g., the Special Grants for Recent Arrivals under Title VII, in addition to the Immigrant Program.

Distribution of Applications. OBEMLA places a "Notice Inviting Applications" into the Federal Register in January each year. The notice advises SEAs of the availability of grant funds, the application period, and the person in the Department to contact for application materials. As SEAs call or write for application packets, OBEMLA sends them a package containing:

- A letter to the applicant from the director of OBEMLA;
- A copy of the application notice appearing in the Federal Register;
- Application Transmittal Instructions;
- Intergovernmental Review and Single State Points of Contact;
- EIEA Legislation;
- EIEA Regulations;
- An "Application for Federal Assistance" (SF424) (see Appendix A); and
- A "Child Count Report" (ED Form T85-1P/OMB No. 1885-0507) (see Appendix A).

The program manager is available by telephone to answer any questions SEAs may have concerning eligibility or the application process.

Submission of Applications. If an SEA is interested in applying for an EIEA grant, it must complete the application and return it by the closing date in May. The SEA will attach the required assurance statements to the application and include some type of cover letter. SEA applications are received at the Department's Application Control Center where they are logged in the computerized system as having been received. The applications are returned to the State and Local Programs Division of OBEMLA for processing the grant awards. The program manager conducts an application review, which includes checking State eligibility, verifying drastic increases from one year to the next, computing the grant amount, and processing the payment authorizations. OBEMLA does not conduct a formal check of the accuracy of the eligibility counts submitted by the

SEAs. Rather, the division has a policy of taking at face value an application and census signed by the chief state school officer. However, since 1990, if a State shows a substantial increase from one year to the next (e.g., a jump from 100 students to 5,000 students), the program manager will contact the SEA to request an explanation for the discrepancy. Prior to 1990, the program manager did not request verification and justification from SEAs that the student counts reported were, in fact, accurate. In the spring of 1990, the original program manager retired and a new program manager was assigned.

In July 1990, the new program manager telephoned California, Florida, Georgia, Illinois, New York, Texas, and Utah regarding their 1990 applications. Each State responded with a letter verifying the March 1, 1990 student count, and offering explanations of the increase over the previous year. None of the eight SEAs changed their student count, and all offered reasons for the increase in enrollments.

The letter from California's Bilingual Education Office suggested:

> ■ As is evident there was an 18 percent increase between FY 1988-89 and FY 1989-90, and a 32 percent increase between FY 1988-89 and FY 1990-91...It is speculated that among the major factors influencing the increases are (1) economic and political factors, (2) geographic/climate factors, and (3) cultural and familial factors.

The letter from Florida's Bureau of Compensatory Education simply stated:

> ■ The report reflects a significant increase in the number of immigrants previously reported by this district [Palm Beach County]. The district is reporting that this change is a result of improved technology and proper application of the EIEA definition.

The letter from Georgia's Migrant/ESOL Program offered a more substantial explanation than those given by the first two States:

- Metro Atlanta continues to be a cluster site for voluntary agency refugee resettlement and immigrant and refugee family reunifications. Because of its favorable employment situation, immigrants are increasingly settling in Atlanta, both as primary migration and as secondary migration. Our May 1990 refugee assurances issued by the Department of State indicated over 300 refugees to be settled for that one month alone.

The letter went on to explain that the primary reason for the large increase however, was the effect of the minimum required threshold for the number of students. Cobb, Fulton, and Gwinnet Counties submitted counts for the first time although for the past few years they were below the 500 threshold by just a few dozen students. The State viewed the new data as being consistent with the data submitted by the district for the Title VII survey and with the ESOL student count data submitted for State funding. The availability of State ESOL funding has affected positively the accuracy with which LM-LEP students are identified.

The letter from Illinois' Transitional Bilingual Education program included a verification letter from the assistant superintendent of the Chicago Public Schools (CPS). The CPS letter simply stated:

- The count is generated by accessing computerized enrollment information contained in the system's student master file. The current immigrant student count remains as submitted (25,109). This count also includes immigrant students enrolled in private, non-public schools.

The letter from New York's Division of Bilingual Education offered several possible reasons for the increase:

- ...the number of New York State eligible LEAs and their eligible immigrant students have been increasing over the years. These increases may be accounted for by several reasons. New York State has been experiencing an influx of East Europeans and other immigrants. Another reason could be the influx of immigrant families in New York City,

> Buffalo, and other large cities and their adjacent metropolitan areas where similar communities, jobs, and other opportunities exist. Also, each year New York City experiences an inter-district student mobility among its community school districts, high schools, and other educational institutions.

The letter from Texas' Administrative Services Unit was the only letter other than Georgia's to suggest that the increase was due to improvements in LEAs' ability to identify and count students:

> We telephoned those local education agencies sustaining the largest increase in numbers of immigrant children and received the following explanations:
>
> 1. Ysleta completed a more in-depth survey.
> 2. Dallas and Houston were receiving larger numbers of South American immigrants.
> 3. San Senito was receiving more immigrants from Mexico.
> 4. El Paso used the new Public Education Management Systems to do a better job of identifying immigrant children.

It should be noted that two months prior to the July verification call, Texas submitted an amended EIEA application. The SEA requested permission to submit a revised application because there was a delay in mailing the surveys and "Some districts were unable to submit their surveys in a timely manner."

Finally, the letter from Utah's Indian and Bilingual Education Program offered the simplest justification of the eight SEAs:

> With the international political winds of change in Europe and the unstable Third World situation around the world, the State of Utah has begun to experience its share of influx of immigrants into the State.

Computation of Grant Amounts. Once all applications have been received and the SEAs' eligibility established, the program manager computes the amount each SEA is to receive. This is a three-step process. First, the program manager multiplies the number of students in each State by $500 (the authorized amount) to determine the authorized grant amount to each State. EIEA funds are distributed to States based on the ratio of EIEA students in qualifying school districts in each state to the total number of EIEA students in the nation.

Second, the program manager adjusts each SEA's initial grant to offset any other Federal funds that the SEA will receive for the same purposes as the Immigrant Program. Under Section 4406 (3)(A) of the EIEA legislation, SEA grants must be reduced by the same dollar amount as the SEA actually receives from other Federal programs with the same purpose.

Third, the $500 rate is then reduced to conform to the actual congressional appropriation. In FY 1989, the per-pupil amount was approximately $62. In FY 1990, the per-pupil amount decreased to approximately $50, and by FY 1991, the amount decreased to approximately $43.

Two Federal programs affecting the amount of the SEA grant have been (1) the Refugee Program, and (2) the Targeted Assistance Program (TAP) in the Department of Health and Human Services (HHS). Each year until the end of the Refugee Program in FY 1990, the program manager reduced each SEA's grant amount by the number of dollars the SEA received under the Refugee Program.

In FY 1990, the program manager made reductions in the EIEA grants to Minnesota, Massachusetts, and Florida because those States received HHS Targeted Assistance grants. In FY 1991, six States applied for HHS targeted assistance grants, but only Florida was successful in receiving funding. The program manager is waiting for a response from Florida verifying whether HHS funds were used to serve children in the EIEA program. If so, OBEMLA will make a determination whether to trigger the EIEA reduction requirement. Any funding withheld from States after the calculation of initial grants is redistributed across all States.

Adjusting SEA grants to compensate for TAP funding is much more difficult than adjusting for Refugee Program funding because TAP funding is administered by a separate Federal agency. In 1990 and 1991, OBEMLA had to adjust for potential TAP awards at a time when HHS had not yet made awards for TAP. Since OBEMLA could not tell which States were to get funds, a portion of the grant award to six States that asked for funds for educational services in grades K-12 was withheld. By the end of September, HHS informed OBEMLA of which States had applied, and OBEMLA asked those States to verify they were receiving HHS money for the same kids as TAP. All three States were receiving these funds, which reduced their student counts accordingly. The money from the initial allocation was then redistributed to the other States, slightly increasing their per-pupil amount.

Federal law known as "the Tydings Amendment" (20 U.S.C. 1225 (b); 34 C.F.R. 76.705) allows SEAs and LEAs an extra year to spend their grant money. Rather than force SEAs to spend funds that arrive in July or August by the end of September (i.e., the end of the Federal fiscal year), the amendment gives the grantees essentially 13 to 15 months to spend the money. Although this relieves much of the pressure on the LEAs, the SEAs and LEAs complain that the funds still arrive after the budgets for the school year have already been set and planning completed. Thus, the staff have to start the new school year suddenly deciding what to do with the money on the same day students are arriving. With such short notice, it is not possible for LEAs to have programs in place for immigrant students arriving the first day of classes unless the LEAs want to be at financial risk. Even though they may know the number of students, they do not know the dollar amount and basing it on last year can be precarious. As previously noted, the 1990 per-pupil amount dropped from $62 to $50. In 1991, the per-pupil grant dropped again, this time to $43 per student. The late timing of the awards and the uncertainty of the grant amount were sources of frequent complaints from the LEAs the evaluation team visited.

In the years up through 1989, OBEMLA computed not only the grant amount for each SEA but also the grant amount for each LEA subgrantee. OBEMLA would notify the SEA of all relevant grant awards, and the SEAs would then notify the LEAs. This practice on the advice of the Department's General Counsel was discontinued in 1990. Because States have the right to determine whether and how much of the 1.5 percent administrative overhead to withhold (see Section IV), it is not proper for OBEMLA to make the determination for the SEA. Several States have complained about OBEMLA no longer computing the LEA grant awards because of the additional workload placed upon SEA program managers.

Once the SEA grant calculations are finalized, OBEMLA notifies each SEA of its grant amount. If it is not possible for OBEMLA to complete the final grant calculation by July--due to delayed decisions by other funding agencies--it will make a preliminary allocation based on those SEAs that have applied for other assistance. Final adjustments are made to grant amounts after HHS has made its funding decisions.

After the grant awards have been made, there is little Federal administrative activity required by the Immigrant Program. OBEMLA will receive five to 10 telephone calls each month from the SEA program managers concerning regulatory requirements and allowable expenses. This number increases to 15 to 20 telephone calls per month in the two months before and after the grant awards are made. OBEMLA occasionally receives calls from LEAs with questions, but the callers are referred to the appropriate SEA program coordinator. No site visits are made to grantees or subgrantees to review program files or observe services provided. The only monitoring activity required under the program statute is the review of bi-annual reports.

2. Refugee Program

During its existence, the Refugee Program was administered by the same office and same program manager as the Immigrant Program. The application process and review process were the same as the Immigrant Program except there was no reduction in SEA grants for other Federal funding received for the same purposes. The application for the Refugee Program consisted primarily of the standard "Application for Federal Assistance" (SF424) and a single Student Report Form (ED Form No. 443-2/OMB No. 1885-0503) for each LEA in the State (See Appendix A). The form indicated the number of elementary school children enrolled, the number of secondary students enrolled, and the total number of refugee students. The SEA completed a copy of the same form as a cover, showing the total number of elementary and secondary students enrolled. The SEA attached the required assurance statements to the application and included a cover letter. The student counts were accepted at face value, and the grant funds were distributed in the same manner as Immigrant Program funds. In FY1989, the per-pupil grant amount was approximately $213.

Under the Refugee Program, the Secretary of Education had the right to call for a recount of students for States experiencing a substantial increase in eligible enrollments. The Secretary never exercised this right.

After the grant awards were made, the only monitoring of the program by the program manager was to review any reports voluntarily submitted by SEAs. No site visits were made to grantees or subgrantees for purposes of reviewing program files or observing the services being provided. No information was collected regarding the funds expended by grantees, and, consequently, there was no evaluation of expenditure patterns or program outcomes. The program manager did respond to telephone and written inquiries from SEAs and LEAs regarding applications, funding status, or the technical requirements of the program. There was no formal **program** of technical assistance to LEAs.

B. Program Targeting and Demographics

1. Immigrant Program

According to GAO, there were 700,000 EIEA-eligible students in the nation's school districts during the 1989-90 school year (GAO, 1991). During the 1989-90 school year, approximately 564,000 (85 percent) of these students were in 529 school districts that received EIEA funds. Each school district receiving EIEA grants averaged approximately 1,066 immigrant students during the 1989-90 school year. The remaining 4,000 school districts that did not receive EIEA funding served an estimated 136,000 immigrant students. The 4,000 school districts not receiving EIEA funds averaged approximately 34 immigrant students during the 1989-90 school year.

According to OBEMLA records, 31 SEAs and 538 LEAs received funds from the Immigrant Program in FY1989. There were a total of 472,098 eligible immigrant students receiving funding. By FY1990, the number of SEAs had increased to 32 (31 States plus Puerto Rico), and the number of LEAs increased to 670. The following year the number of SEAs increased to 37, and the number of LEAs increased to 742. Table III-1 shows the SEAs applying and the number of eligible students for FY1989-FY1991. Table III-2 shows the number of LEAs reporting eligible immigrant students during the same time period. A complete listing of the number of eligible students in all SEAs and LEAs for FY1989-91 is presented in Appendix B. See Table III-3 for immigrant subgrantees by location in metropolitan statistical areas.

The following nine SEAs have never applied for Immigrant Program funds, although they did apply for Refugee Program grants:

> Alabama, Arkansas, Delaware, Indiana, Kentucky, Nevada,
> New Hampshire, South Dakota, and Vermont.

All States with large numbers of immigrants (California, New York, Texas, Illinois, Florida, and New Jersey) have applied for Immigrant Program grants.

2. Refugee Program

In FY1989, the last year of the Refugee Program, 410 LEAs in 47 States received funding through the Refugee Program (see Table III-4). SEAs reported that 74,229 children were eligible for the program. A complete listing of the number of eligible students in the SEAs and LEAs for FY1989-91 is presented in Appendix B. See Table III-5 for refugee subgrantees by location in metropolitan statistical area. In early 1989, program regulations were changed to require eligible LEAs to have at least 20 refugee students to apply for funds. This restriction reduced the number of participating LEAs by half and decreased the number of refugee students served by the program from 80,215 to 72,190 (Coro, FY1989 Hearings, p. 456). Four SEAs (Alaska, New Mexico, West Virginia, and Wyoming) never applied for the Refugee Program due to their low counts of refugee students.

The accuracy of the SEA and LEA eligibility counts can be assessed by comparing them to another, independent count of the same population. The only independent count found by the evaluation team was one conducted by the Office of Refugee Resettlement (ORR) in the Department of Health and Human Services (DHHS). One of ORR's responsibilities is to develop monthly and annual estimates of the number of refugees in each State and county in the United States. To develop these estimates, ORR uses data collected at the port of entry by Centers for Disease Control inspectors. Each refugee completes an arrival form prior to leaving his or her foreign country and entering the United States. Each person, regardless of age, has one form that indicates where the individual is going to locate in the United States. ORR receives a copy of this form and adds other biographical information from INS records, the State Department, and the Refugee Data Center. By cross-checking information from these sources, ORR is able to validate the accuracy of the records in the database.

Table III-1

DISTRIBUTION OF REPORTED ELIGIBLE IMMIGRANT STUDENTS BY STATE

State	# Imm. 1989	# Imm. 1990	# Imm. 1991	% chg. 89-90	% chg. 90-91
Arizona	9,168	11,470	13,652	25.1	19.0
California	226,119	268,455	318,689	18.7	18.7
Colorado	1,910	1,345	2,083	-29.6	54.9
Connecticut	3,097	4,110	4,414	32.7	7.4
District of Col.	4,803	6,211	5,761	29.3	-7.2
Florida	22,578	18,697	23,893	-17.2	27.8
Georgia	961	3,032	3,848	215.5	26.9
Hawaii	3,064	2,913	2,906	- 4.9	- .2
Idaho	DNA	DNA	327	NA	NA
Illinois	20,522	30,965	33,699	50.9	8.8
Iowa	DNA	639	253	NA	-60.4
Kansas	889	1,233	1,905	38.7	54.5
Louisiana	2,869	3,750	3,361	30.7	-10.4
Maine	DNA	DNA	257	NA	NA
Maryland	9,567	10,165	12,069	6.3	18.7
Massachusetts	15,424	16,928	17,344	9.8	2.5
Michigan	3,496	1,913	2,704	-45.3	41.3
Minnesota	2,380	2,890	2,875	21.4	- .5
Missouri	648	1,079	1,564	66.5	44.9
Montana	DNA	104	106	NA	1.9
Nebraska	47	DNA	DNA	NA	NA
New Jersey	14,475	18,425	21,293	27.3	15.6

Table III-1, (Continued)

State	# Imm. 1989	# Imm. 1990	# Imm. 1991	% chg. 89-90	% chg. 90-91
New Mexico	2,512	3,126	4,235	24.4	35.5
New York	53,352	100,769	111,647	88.9	10.
North Dakota	DNA	DNA	315	NA	NA
Ohio	1,730	1,445	1,428	-16.5	-1.2
Oklahoma	541	678	733	25.3	8.1
Oregon	1,386	2,233	3,984	61.1	78.4
Pennsylvania	3,173	3,635	4,242	14.6	16.7
Rhode Island	6,084	7,015	7,263	15.3	3.5
Tennessee	1,408	1,521	1,233	8.0	-18.9
Texas	37,950	47,963	42,113	26.4	-12.2
Utah	1,749	6,376	7,229	264.5	13.4
Virginia	10,164	9,800	10,861	-3.9	10.9
Washington	7,945	9,623	12,732	21.1	32.3
Wisconsin	DNA	2,057	1,479	NA	-28.1
Puerto Rico	2,087	DNA	2,267	NA	NA
Guam	DNA	DNA	621	NA	NA
TOTAL	472,098	600,565	685,586	27.2	14.2

DNA = Did not apply

Table III-2

DISTRIBUTION OF LEAs WITH REPORTED ELIGIBLE IMMIGRANT STUDENTS BY STATE

State	# LEAs 1989	# LEAs 1990	# LEAs 1991	% chg. 89-90	% chg. 90-91
Arizona	23	24	27	4.3	12.5
California	256	291	313	13.7	7.6
Colorado	4	3	5	-25.0	66.6
Connecticut	4	6	6	50.0	0
District of Col.	1	1	1	0	0
Florida	4	5	7	25.0	40.0
Georgia	1	4	5	300.0	25.0
Hawaii	1	1	1	0	0
Idaho	DNA	DNA	1	--	--
Illinois	20	30	31	50.0	3.3
Iowa	DNA	4	3	--	-25.0
Kansas	2	5	6	150.0	20.0
Louisiana	2	3	3	50.0	0
Maine	DNA	DNA	1	--	--
Maryland	3	3	3	0	0
Massachusetts	22	26	28	18.2	7.7
Michigan	5	3	4	-40.0	33.3
Minnesota	2	2	4	0	100.0
Missouri	1	1	2	0	100.0
Montana	DNA	3	2	--	-33.3
New Jersey	40	55	71	37.5	29.0

State	# LEAs 1989	# LEAs 1990	# LEAs 1991	% chg. 89-90	% chg. 90-91
New Mexico	6	6	6	0	0
New York	62	69	78	11.3	13.0
North Dakota	DNA	DNA	1	--	--
Ohio	2	2	2	0	0
Oklahoma	1	1	1	0	0
Oregon	8	17	21	112.5	23.5
Pennsylvania	1	1	1	0	0
Rhode Island	3	3	3	0	0
Tennessee	2	2	2	0	0
Texas	47	61	58	29.8	-4.9
Utah	6	8	9	33.3	12.5
Virginia	3	3	6	0	100.0
Washington	10	20	32	100.0	60.0
Wisconsin	DNA	4	2	--	-50.0
Puerto Rico	1	1	1	0	0
Guam	DNA	DNA	1	--	--
TOTAL	543	669	761	23.2	13.8

DNA = Did not apply

Table III-3

IMMIGRANT SUBGRANTEES BY LOCATION IN METROPOLITAN STATISTICAL AREA (MSA)

Metropolitan Location	No. Districts	Percent
Serves Central City of MSA	122	23%
Serves MSA, but not primarily its Central City	314	58%
Not located in MSA	62	11%
Unknown	41	8%
Total	539	100%

Since 1982, the database has included refugees arriving from all areas of the world. The database contains only persons entering with refugee status, so those persons entering as immigrants or with other non-refugee documents are not included. The ORR database shows the age of the individual, the country of origin, and the city of intended location. ORR analyzes the data to produce two reports. The first is a monthly printout showing refugee arrivals for the month and year-to-date by State and county. The second is a monthly report showing age breakdown and gender of the arrivals for the month and year-to-date. The age categories include 6-11 and 12-17 years.

ORR attempted to adjust its figures for secondary migration by comparing its estimates with those of the annual Refugee Program child count and with other DHHS records of adult refugees. Although the amount of the secondary migration each month is not large--about 14,000 of 200,000--some States are affected more than others. For example, Massachusetts has substantial numbers of refugees moving into the State, while Texas has substantial numbers moving out. Each year, ORR compared OBEMLA's percentage distribution across States (rather than absolute figures) with ORR's. If the OBEMLA figures were within 10 percent of ORR's, ORR revised its figures in the same direction. A discrepancy of more than 10 percent, however, caused ORR to view the OBEMLA statistics as suspect.

Between 1983 and 1989, ORR produced an annual comparison of its figures with those of OBEMLA, which raised questions about the accuracy of the data reported by several SEAs. The last analysis was done using the March 1989

OBEMLA child count and ORR's count of school-aged children who arrived during approximately the same time period (January 1986 through March 1989). The number of refugee children reported by SEAs (74,084) was 27 percent higher than the number counted by ORR (58,546). Table III-6 presents ORR and OBEMLA's State-by-State comparison. ORR explains the discrepancy thus:

> In order to report such figures, some school districts must be reporting foreign-born children who are not refugees, or refugee children without regard to date of entry, or both. As in the past, a few States seem to be the focus of most of the misreporting. Delaware, Florida, and Rhode Island reported about five times or more as many children as were actually placed there; they have been the worst offenders in the past, although their figures are less out of line than last year. In the second tier, Kansas, Louisiana, Massachusetts, and Nebraska reported figures between two and three times their resettlement figures (Gordon, 1989).

Where the Refugee Program count was higher than the ORR count, the discrepancy could be explained by secondary migration into the State. Similarly, if the OBEMLA count was lower than the ORR count, the discrepancy could be explained by secondary migration out of the State. The discrepancy could also have been due to improper counting.

No other data on the numbers of eligible refugee students were available from the Census Bureauor the INS. In general, SEA/LEA-reported eligibility data are difficult to correlate with other data sources such as Census data, INS data, and public/private community groups, for two reasons. First, only a small percentage of LEAs applied for and received Refugee Program grants from the SEAs, which means that SEAs do not have a full count of their refugee populations. Thus, comparing micro-level OBEMLA figures with macro-level data from the Census Bureau or INS would be inappropriate.

Table III-4

DISTRIBUTION OF REPORTED ELIGIBLE REFUGEE STUDENTS BY STATE

State	# Refs 1989	# LEAs 1989	Lowest Count	Highest Count
Alabama	68	2	29	39
Arizona	480	11	21	129
Arkansas	136	3	2	99
California	26,128	51	1	7,497
Colorado	331	5	32	157
Connecticut	889	13	21	301
Delaware	283	5	3	177
District of Col.	212	1	212	212
Florida	10,205	17	9	8,945
Georgia	539	6	48	145
Hawaii	208	1	208	208
Idaho	86	3	8	57
Illinois	3,269	12	23	2,473
Indiana	109	3	21	66
Iowa	482	4	44	274
Kansas	1,085	10	1	704
Kentucky	205	2	28	177
Louisiana	1,061	8	21	686
Maine	177	4	22	90
Maryland	493	8	20	185
Massachusetts	4,718	30	23	901
Michigan	1,191	11	21	466
Minnesota	2,253	14	21	1,057

State	# Refs 1989	# LEAs 1989	Lowest Count	Highest Count
Mississippi	25	1	25	25
Missouri	416	4	28	312
Montana	41	2	20	21
Nebraska	438	4	22	334
Nevada	167	3	6	97
New Hampshire	64	2	31	33
New Jersey	816	10	20	457
New York	2,751	34	1	542
North Carolina	267	6	21	85
North Dakota	50	1	50	50
Ohio	1,992	8	22	550
Oklahoma	399	5	24	229
Oregon	505	5	26	369
Pennsylvania	1,359	10	20	998
Rhode Island	1,518	3	45	1,410
South Carolina	24	2	?	?
South Dakota	23	1	23	23
Tennessee	912	3	70	452
Texas	2,644	31	21	395
Utah	459	9	2	156
Vermont	20	1	20	20
Virginia	1,808	15	21	686
Washington	2,651	15	23	987
Wisconsin	1,356	13	20	411
Total	74,229	410		

Table III-5

REFUGEE SUBGRANTEES BY LOCATION IN METROPOLITAN STATISTICAL AREA (MSA)

Metropolitan Location	No. Districts	Percent
Serves Central City of MSA	151	37%
Serves MSA, but not primarily its Central City	191	47%
Not located in MSA	47	11%
Unknown	21	5%
Total	410	100%

Table III-6

COMPARISON OF ORR AND OBEMLA COUNTS FOR REFUGEES

State	School Age Arrivals 1/86-3/89	Ed. Child Count 3/89	Ed. Count Divided by Arrivals
Alabama	136	68	0.50
Alaska	0	0	0.00
Arizona	698	480	0.69
Arkansas	150	134	0.89
California	12,094	25,742	2.13
Colorado	570	356	0.62
Connecticut	668	889	1.33
Delaware	19	260	13.68
Dist. of Columbia	308	212	0.69
Florida	1,855	10,078	5.43
Georgia	802	539	0.67
Hawaii	290	208	0.72
Idaho	114	78	0.68
Illinois	2,078	3,269	1.57
Indiana	139	109	0.78
Iowa	530	482	0.91
Kansas	445	1,046	2.35
Kentucky	283	205	0.72
Louisiana	435	1,061	2.44
Maine	114	176	1.54
Maryland	689	493	0.72
Massachusetts	1,920	4,718	2.46
Michigan	966	1,191	1.23
Minnesota	2,154	2,253	1.05
Mississippi	100	25	0.25
Missouri	493	416	0.84
Montana	36	41	1.14

State	School Age Arrivals 1/86-3/89	Ed. Child Count 3/89	Ed. Count Divided by Arrivals
Nebraska	152	438	2.88
Nevada	186	161	0.87
New Hampshire	83	64	0.77
New Jersey	935	820	0.88
New Mexico	126	0	0.00
New York	5,193	2,763	0.53
North Carolina	401	268	0.67
North Dakota	71	50	0.70
Ohio	674	1,033	1.53
Oklahoma	244	339	1.39
Oregon	897	505	0.56
Pennsylvania	1,507	1,359	0.90
Rhode Island	321	1,518	4.73
South Carolina	59	24	0.41
South Dakota	75	23	0.31
Tennessee	620	912	1.47
Texas	2,889	2,644	0.92
Utah	464	473	1.02
Vermont	67	20	0.30
Virginia	1,280	1,779	1.39
Washington	2,051	3,006	1.47
West Virginia	5	0	0.00
Wisconsin	1,158	1,356	1.17
Wyoming	2	0	0.00
Total	58,546	74,084	1.27

Source: Memorandum from Linda Gordon to Philip Holman, Director, Division of Policy and Analysis, ORR, 1989.

Second, no consistent method is used to estimate the refugee population in this country. Figures are estimated under different assumptions, using different definitions, and for different purposes. Census data do not distinguish between refugees and immigrants as clearly as the INS does because refugees become permanent residents (immigrants) after one year of residency in the country.

C. Program Outcomes

1. Immigrant Program

OBEMLA does not collect information from SEAs concerning outcome measures of student achievement and performance. In addition, prior to FY 1989, OBEMLA did not require SEAs to report outcomes of their Immigrant Program grants, or indicators such as the number of students served and grant expenditures. Only California and Arizona have voluntarily submitted expenditure and evaluation reports. California submitted performance reports for its Immigrant Program in FY 1984 and FY 1988. Arizona submitted performance reports for its Immigrant Program in FY 1988.

In 1988, Section 4410 was added to the EIEA legislation requiring that biennial reports be submitted from LEAs to the SEAs, and from the SEAs to the Secretary of Education. The biennial reports provide the Federal program manager with information on the country of origin for immigrant students, LEA expenditures, and SEA expenditures for each grant year. The first set of biennial reports was submitted at the end of 1991 for the 1988-89 and 1989-90 grant years. The information from the biennial reports has been analyzed, and the results of the analyses are presented in the next two sections.

2. Refugee Program

OBEMLA did not require SEAs to report information regarding the outcomes from their Refugee Program grants as is required under EDGAR. Because there was no established reporting format for preparing such a report, SEA reports submitted were not comparable for evaluation purposes and, therefore, of little use. Thus, the Refugee Program manager had little, if any, information regarding the number of eligible students actually served or the services provided under the grants.

IV. STATE PROGRAM OPERATION

IV. STATE PROGRAM OPERATION

The SEAs receive the Federal grants for both the Immigrant and Refugee Programs. The SEAs, in turn, distribute the grant money to eligible LEAs within the State. This section describes how SEAs administer the two programs.

A. Program Administration and Expenditures

1. Immigrant Program

Administrative Structure. SEAs usually administer the Immigrant Program grant through the same State office that administers Title VII and other bilingual education programs. In California, the administrative office is the Bilingual Education Office; in Pennsylvania, it is the Bilingual Education Section of the Bureau of Curriculum and Instruction; and in Maryland, it is the Language Development and Early Learning Branch of the Division of Instruction. Whatever the title of the administrative office, the SEA assigns one or two staff to process paperwork and provide technical assistance to LEAs. In SEAs having smaller immigrant student populations--and, therefore, smaller grants--one staff person is assigned to administer the Immigrant Program along with administrative duties on other grants (e.g., the Refugee Program when it was operational). In SEAs with larger grants, the staff person may be assigned full-time to the Immigrant Program, with budget and clerical support frequently provided by other specialists in the SEA. In 1990, for example, Arizona had a full-time education program specialist who provided technical assistance to LEAs and an administrative assistant, one-quarter of whose time was allocated for processing LEA applications and subgrant payments.

Recently submitted biennial reports from SEAs for the 1988-89 and 1989-90 school years show that SEAs spent an average of 1.3 percent of their grant for State administration of the Immigrant Program. Under Section 4404 of the authorizing statute, SEAs are allowed to withhold up to 1.5 percent of the grant amount for "proper and efficient administration of its functions" (20 U.S.C. 3124). As shown in Table IV-1, 11 of the 29 SEAs reporting for 1988-89, and 12 of the 31 SEAs reporting for 1989-90 did not withhold any grant funds for SEA administrative use, passing the entire amount on to their LEAs. For 1989-90, nine of the SEAs withheld the total 1.5 percent, while four exceeded the 1.5 percent cap in FY1990. The remaining SEAs withheld varying percentages between 0 percent and 1.5 percent.

Little information is reported on how SEAs that withheld an administrative fee spent their funds. The biennial reports provide no accounting of State activities, although occasionally an SEA will include a list of expenditures. In 1989, SEAs began to include more descriptive information in their applications for Immigrant Program funds. These descriptions ranged from a simple one-paragraph explanation of how the SEA was going to count students and distribute funds to a plan several paragraphs long detailing specific activities. States including supplementary statements usually repeated them in each year's application.

Distribution of Applications. The most frequently cited SEA activity was the distribution of subgrant applications to LEAs once the SEA was notified of its grant award. The SEA prepares an LEA application form (usually an adaptation of the Federal form) and instructions for conducting the student count. The LEA application forms used by Tennessee and California are presented in Appendix A. Once the SEA staff have distributed the application materials, they answer any questions the LEAs may have about student eligibility or completing the paperwork.

It appears that California and Tennessee are the only SEAs in which SEA staff provide LEAs with extra assistance in preparing their applications. In both 1990 and 1991, the California Bilingual Education Office (BEO) invited all school districts in the State to six workshops held to (1) brief educational agency staff on

Table IV-1

SEA ADMINISTRATIVE COSTS BY STATE
IMMIGRANT PROGRAM
1988-89 AND 1989-90

State	1988-89 Grant Amt. (dollars)	SEA Adm. Costs (percent)	1989-90 Grant Amt. (dollars)	SEA Adm. Costs (percent)
Arizona	544,083	1.4	517,360	0.1
California	13,532,521	1.5	12,541,801	1.7
Colorado	170,052	0.0	117,924	0.0
Connecticut	162,892	1.5	187,962	1.5
Dist. of Col.	289,373	0.0	299,583	0.0
Florida	n/a	n/a	1,217,205	1.5
Georgia	47,632	0.0	35,453	0.5
Hawaii	252,385	1.5	185,748	1.6
Illinois	1,180,924	0.0	1,206,827	0.0
Kansas	40,952	0.8	37,222	0.0
Louisiana	234,234	1.6	171,575	1.4
Maryland	561,113	0.0	527,319	0.0
Massachusetts	765,020	1.5	898,205	1.5
Michigan	163,786	1.5	208,066	1.5
Minnesota	127,765	1.5	109,836	1.5
Missouri	30,205	0.0	33,346	0.0
New Jersey	577,400	0.7	911,750	0.6
New Mexico	145,124	0.0	121,290	0.0
New York	2,768,191	1.9	3,394,158	1.6
Ohio	102,784	1.5	94,144	1.5
Oklahoma	64,963	0.0	56,621	0.0
Oregon	83,215	0.3	79,127	0.0
Pennsylvania	145,483	1.5	179,645	1.5
Rhode Island	254,143	1.4	308,191	0.0

Table IV-1, (Continued)

State	1988-89 Grant Amt. (dollars)	SEA Adm. Costs (percent)	1989-90 Grant Amt. (dollars)	SEA Adm. Costs (percent)
Tennessee	61,036	1.0	36,105	0.0
Texas	n/a	n/a	2,425,265	0.1
Utah	110,608	0.0	100,236	1.4
Virginia	552,609	1.7	481,187	1.5
Washington	439,431	0.0	334,510	2.1
Wisconsin	42,128	1.5	77,562	1.5
Puerto Rico	146,957	0.0	130,568	0.0
TOTAL	23,597,009	1.3	27,025,791	1.3

n/a = not available

Source: SEA Biennial Reports for 1988-89, 1989-90, OBEMLA.

various aspects of the Immigrant Program, and (2) explain subgrant application procedures. The workshops were conducted in the six counties that included the bulk of school districts participating in the program. At the workshop, BEO staff explained the procedures, application forms, student counts, and fiscal and performance reporting requirements. In addition to sponsoring the workshops, SEA staff sent a letter describing the subgrant application procedures to 1,018 school district offices, 58 county superintendents, and contact persons for those districts that had Immigrant Programs in the previous school year. Another letter, which included all the application information, was sent to administrators of non-profit private schools encouraging their participation.

In 1990, the Tennessee SEA staff met with the Statewide Council for Attendance Supervisors to address the need for identifying "non-English background children and those who are LEP." The SEA staff also conducted a workshop for school systems with large enrollments of immigrant children and for other SEA personnel (including the director of the State Testing Office and her staff) to develop and discuss methods for identifying non-English language background students who are LEP.

Distribution of Subgrants to LEAs. Once the LEA applications are returned, the SEA staff review them for compliance with program regulations. Several SEAs stated in their applications to OBEMLA that the SEA requests specific plans from LEAs for expending funds, but there was no information in the SEA application describing what those LEA plans actually proposed. The one exception was Puerto Rico, which provided several pages of detailed activities. If the LEA plan is approved, the SEA staff ask the SEA financial office to distribute the Immigrant Program funds to the LEA. If the SEA withholds an administrative fee, the SEA staff will deduct it from the total SEA grant amount and distribute the remaining funds across LEAs in proportion to their number of eligible immigrant students.

Technical Assistance and Monitoring. After SEA staff distribute subgrants to the LEAs, they also provide technical assistance if requested and monitor the subgrantees' performance. Again, little information regarding these activities is reported by SEAs. Although many SEAs stated in their applications that they would provide technical assistance, only California reported in either its next application or its biennial report precisely what technical assistance actually was provided. In 1990, California staff sponsored four regional/State conferences: two Latino Immigrant Conferences; the Second Annual State Conference on Armenian Language and Culture; and the Eighth Annual Southeast Asian Education Conference. Major training areas included: cross-cultural communication; cross-cultural counseling; and oral language development.

Similarly, many SEAs stated that they would monitor the LEAs, but only New Mexico and Tennessee provided any documentation. New Mexico included copies of its monitoring reports as part of its application (see Appendix A for the monitoring review of Deming Public Schools dated March 14, 1990). Based on the review of services and materials, the bilingual specialist conducting the review "found these to be of a very high quality. The design of the training objective is excellent, and the materials that have been purchased are very appropriate to the students being served." Tennessee reported in its application that it simply had conducted site visits for purposes of helping to identify eligible students.

2. Refugee Program

Administrative Structure. Like the Immigrant Program, the Refugee Program was administered at the SEA level by a single program coordinator, with support from other specialized staff, such as a budget officer or clerical workers. Each SEA had a Refugee Program coordinator who was responsible for sending subgrant application materials to all LEAs, reviewing returned applications, distributing grant funds, providing technical assistance, and monitoring LEA use of funds. More than half (54 percent) of the SEAs reported that the Refugee

Program coordinator spent at most 5 percent of his or her time on program administration. In at least 14 SEAs, the coordinator also was responsible for as many as five other programs, including the Emergency Immigrant Education Program, Chapter I, Title VII Bilingual Education/ESL, Chapter I Migrant Education, and state compensatory education programs. A few SEAs also reported using other professional staff such as an assistant coordinator, evaluator, auditor, or subject area specialists.

The SEA Refugee Program coordinator and support staff were responsible for a number of activities during the 1989-90 school year including:

- Compiling annual data on the number of eligible refugee children;
- Determining grant amounts for school districts;
- Determining priorities, objectives, and requirements for the SEA's Refugee Program;
- Assisting school districts in writing project reports;
- Tracking the financial expenditures of State set-aside funding;
- Tracking local expenditures of grant funds; and
- Conducting evaluations of the program.

Under Refugee Program regulations, SEAs are allowed to withhold up to 1 percent of the grant amount for purposes of State administration of the grant. Of the 42 SEAs receiving grants, seven did not withhold any funds for State administration. Those seven were: Arkansas, Delaware, Idaho, Nevada, New Hampshire, Oklahoma, and Utah. Those SEAs that withheld funds used them for salaries, travel, computers, space, telephone, supplies, and indirect costs. As shown in Table IV-2, administrative funds were spent primarily on salaries, supplies, and travel.

Table IV-2

DISTRIBUTION OF SEA ADMINISTRATIVE COSTS BY CATEGORY BY STATE
REFUGEE PROGRAM
1989-90

State[1]	Salary & Fringe	Computer	Travel	Office Space	Phone	Supply	Contr. Serv.	Other
Arizona						50%		50%
Colorado							100%	
Connecticut		2%	50%		10%	10%		
Illinois	100%							
Iowa	100%							
Kansas	100%							
Kentucky			25%	20%	5%	50%		
Louisiana			10%			5%		
Maine			100%					
Maryland						50%	50%	
Minnesota		50%	25%			25%		
Missouri						100%		
Montana						100%		
Nebraska	100%							
New York						100%		
North Carolina	50%		50%					
Oregon	100%							
Pennsylvania			50%		10%	40%		
South Carolina					25%	25%		50%
Tennessee			50%			50%		
Virginia		1%				97%	2%	

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[1] States listed are those responding to the SEA survey question on administrative costs. Other SEAs were not able to provide a response at the time of the interview.

Distribution of Applications and Subgrants. The SEA program staff members review local grant applications in several ways. With multiple responses allowed, 15 SEAs use a checklist to review applications, 20 SEAs have the refugee coordinator review applications, 20 SEAs have the coordinator and other SEA staff review applications, and two SEAs have other staff review the applications.

SEA staff require that LEAs address the following specific information in their grant applications (multiple responses allowed):

- Eligibility counts (39 States);
- Description of services (39 States);
- Budget (28 States);
- Expenditure reports (20 States);
- Evaluation plans (15 States);
- Evaluation results (11 States); and
- Staff resumes and qualifications (6 States).

Seven SEAs (17 percent) rejected a total of 19 LEA applications for the 1989-90 school year. Five SEAs rejected applications based on small program size, and two SEAs cited other reasons for their rejections. A total of 152 children were affected by the denial of applications in those seven SEAs.

Technical Assistance and Monitoring. The SEAs (N=34) typically provide technical assistance to local Refugee Programs, including (multiple responses allowed):

- Identifying eligible students (85 percent);
- Improving the Refugee Program project (74 percent);

- Improving the quality of instructional services (74 percent);
- Testing issues (68 percent);
- Completing required reports (65 percent);
- Involving parents (59 percent);
- Setting up evaluation procedures (44 percent);
- Designing a needs assessment (35 percent); and
- Analyzing test results (29 percent).

Sixteen SEAs reported being in contact with the local program coordinator weekly, bimonthly, or monthly. About 60 percent of the SEAs (n=25) were in touch with the local refugee coordinator at other time intervals. SEAs typically discussed financial matters, eligibility counts, applications, program content, program evaluations, coordination with other programs, and evaluation procedures with the local refugee coordinator.

Fewer than half (14) of the SEAs reported meeting with LEA program coordinators on a regular basis (seven meet annually, one every two years, and six meet at irregular intervals). However, the same SEAs reported that they will send LEA program coordinators, teachers, and even a few superintendents to statewide meetings. At the meetings between SEA and LEA staff, discussion targeted (multiple responses allowed):

- Program content (86 percent);
- Financial matters (79 percent);
- Applications (71 percent); and
- Eligibility counts (64 percent).

Once the subgrants were awarded to LEAs, the program staff of most SEAs (83 percent) continued monitoring LEA program operations. SEAs most frequently (79 percent) monitored LEAs through site visits. One-half of the SEAs (17) schedule annual on-site monitoring visits, 21 percent of the SEAs schedule on-site visits at different times, three SEAs monitor on-site visits every four years or more, and five monitor on-site every three years or less.

Most SEAs (79 percent) monitored Refugee Program compliance through other means as well, including review of LEA documents submitted to the State and telephone interviews. SEAs reported monitoring by other than on-site reviews and reported districts with audit exceptions.

Administrative Recordkeeping. The following records of expenditures, services, and outcomes were kept by the SEA for each program:

- All SEAs reported submitting annual expenditure reports for the 1989-90 school year;
- Thirty-eight SEAs assigned staff to maintain financial records on the State set-aside amount;
- Thirty-four SEAs require districts to submit end-of-year expenditure reports for the Refugee Programs;
- Thirty-three SEAs reported that they did not conduct program evaluations; and
- Fifteen SEAs required school districts to conduct evaluations of their Refugee Programs;
- Eleven SEAs conducted evaluations of the Refugee Program;
- Nine SEAs conducted statewide program evaluations; and
- Two SEAs tracked local expenditures.

These records were used for:

- Preparing statewide reports;

- Justifying budgets;
- Tracking spending; and
- Understanding special needs of the population.

B. Program Targeting and Demographics

1. Immigrant Program

A review of the State applications on file at OBEMLA indicated that all States use the Federal definition of eligibility as their own. Section 581.4 (b) (2) of the Immigrant Program regulations defines eligible immigrant children as "children who were not born in any State and who have been attending schools in any one or more States for less than three complete academic years." This definition is incorporated into the SEA instructions to LEAs either by citing the Federal regulation or by exact wording in the document. There was no evidence of additional eligibility criteria imposed by an SEA.

The SEAs ask LEAs to report the total number of eligible children in the district as of a particular date (usually March) and instruct the LEA on how to identify the eligible children. The SEAs also request that the LEA "maintain adequate documentation of student eligibility verification" and that they describe in their applications the method used to determine eligibility. The descriptions reviewed by the study team, however, were little more than statements that the count was completed. The Tennessee LEA application form shown in Exhibit IV-1 is typical of the kinds of descriptions of how the actual count is conducted.

The FY1988 Annual Performance Report from California stated that the LEAs used student enrollment records, immigration cards, or a computerized data system to search for their students' place of birth and date of enrollment at their school. The report did not indicate whether the SEA checked the accuracy of the count. The use of a variety of procedures suggests that student counts are conducted differently across districts. However, it is very difficult to check the accuracy of SEA and LEA eligibility data. By law, all school-aged children are entitled to public schooling. Officials have no authority to check students' immigration documents, nor any obligation to allow the Immigration and Naturalization Service (INS) or other investigative agencies to do so in the schools (Carrera, 1989).

There was no evidence to suggest that SEAs conduct an independent count or verification of the numbers of eligible students reported by LEAs, except where requested by OBEMLA for confirmation of substantial increases from one year to the next (see Section III). SEA and LEA officials appear to rely on the voluntary reporting of status by students at the time the eligibility count is conducted.

2. Refugee Program

To determine the number of eligible refugee children reported in the States' Refugee Program applications, 38 SEAs (91 percent) used district counts, one SEA (2 percent) used its own count, and three SEAs (7 percent) used another method.

Forty-one SEAs (98 percent) reported providing instructions to the districts for determining refugee eligibility.

Out of these, the following types of instructions for determining eligibility were reported (multiple responses allowed):

- Inspect refugee children's documents (20 SEAs);
- Use date of enrollment and country of origin to determine eligibility (16 SEAs);
- Rely on student's self reporting (eight SEAs); and
- Other instructions (22 SEAs).

Regardless of all of the requirements for determining eligibility, 18 SEAs (43 percent) do not verify the accuracy of the annual counts reported by LEAs, although 23 SEAs (55 percent) do verify the accuracy of the counts submitted by districts. Furthermore, none of the SEA coordinators have ever been asked to substantiate reported eligibility counts.

It appears that LEA staff may be able to identify refugee children more easily than other immigrant students because all refugees legally admitted into the country usually have the appropriate documents and are not likely to shy away from officials asking questions, thus making identification of students and the count more reliable.

C. Program Services

Program regulations for both the Immigrant Program and the Refugee Program allowed the SEA to provide services directly to eligible elementary or secondary school students attending nonprofit private schools if an LEA was reluctant to provide such services. No SEAs have used this "bypass provision" of either program to serve students directly.

D. Program Outcomes

1. Immigrant Program

At the SEA level, little information is reported about program outcomes. As described in Section III, the Immigrant Program was amended in FY 1989 to require that SEAs submit biennial reports on program expenditures and numbers of students by country of origin. The first set of biennial reports was received in December 1991 and is being reviewed by OBEMLA. The summary of program expenditures by line-item category is reported in Section V, and the summaries of country of origin for immigrant students are shown in Tables IV-3 and IV-4. No information is included on specific program outcomes such as changes in test scores or school performance for immigrant students receiving Immigrant Program services.

The information reported by SEAs on the country of origin for immigrant student documents three important characteristics of the Immigrant Program. First, as shown in Table IV-3, there is substantial variation among SEAs in the number of countries represented in their immigrant student population. Minnesota and Puerto Rico had students from only five different countries in the 1988-89 school year, but New York had students from 137 different countries. Although it was expected that the SEAs with larger numbers of immigrant students would have greater diversity in national origin (and therefore primary language), some of the SEAs with medium-sized immigrant students populations had the greatest diversity. For example, Maryland, the District of Columbia, and Virginia have students from 120, 118, and 105 different countries respectively.

Second, as shown in Table IV-4, the proportion of students in the Immigrant Program from any one country can change substantially from year to year. For example, the number of students from Qatar jumped from 269 in 1988-89 school year to 2,799 the following school year. The proportion of students from any one country also can fluctuate, suggesting that the mix of students in any district changes rapidly. For example, the number of students from Brazil increased from 1,621 to 1,943 between 1988 and 1989, but the proportion of students from Brazil dropped from .43 percent to .41 percent as other ethnic groups increased in size.

Third, also as shown in Tables IV-3 and IV-4, immigrant students come from 171 different countries (or ethnic groups--see footnote 2 to Table IV-3). While 122,769 (32.87 percent of the total) students come from Mexico, fewer than 20 (less than .01 percent) students come from each of 45 other countries. These data are in keeping with complaints from LEAs that the difficulty in serving immigrant students is more in dealing with the numbers of different countries and language groups than with the absolute number of immigrant students.

Table IV-3

COUNTRY OF ORIGIN FOR STUDENTS SERVED
IMMIGRANT PROGRAM
1988-89 AND 1989-90

State	Students Served 1988-89[1]	No. of Different Countries[2]	Students Served 1989-90	No. of Different Countries
Arizona	8,265	72	9,384	79
California	202,682	82	227,475	80
Colorado	2,513	83	1,887	70
Connecticut	2,501	86	3,073	81
Dist. of Col.	3,676	118	4,244	121
Florida	n/a	n/a	18,680	79
Georgia	3,951	101	4,117	101
Hawaii	5,242	37	4,114	34
Illinois	18,042	108	18,540	109
Kansas	836	24	746	23
Louisiana	3,668	51	3,668	51
Maryland	8,451	120	8,355	115
Massachusetts	12,515	92	15,308	105
Michigan	3,394	78	3,400	80
Minnesota	4,430	5	5,826	4
Missouri	387	8	365	8
New Jersey	10,763	76	11,030	138
New Mexico	2,210	21	2,548	24
New York	50,413	137	55,607	138
Ohio	2,464	64	1,574	64
Oklahoma	594	28	560	27
Oregon	1,312	36	1,487	35
Pennsylvania	3,337	76	3,281	85
Rhode Island	183	23	6,282	39

Table IV-3, (Continued)

State	Students Served 1988-89[1]	No. of Different Countries[2]	Students Served 1989-90	No. of Different Countries
Tennessee	n/a	n/a	1,409	47
Texas	2,866	27	36,507	103
Utah	n/a	n/a	3,875	36
Virginia	9,820	105	10,172	108
Washington	5,717	42	6,105	53
Wisconsin	714	45	1,376	43
Puerto Rico	2,500	5	2,087	7
TOTAL	373,466	171	473,082	166

n/a = not available

Source: SEA Biennial Reports for 1988-89, 1989-90, OBEMLA.

1. This is the number reported by SEAs in their biennial reports. The number reported here may be larger or smaller than the number of eligible students reported by the SEAs on their applications.

2. The Country of Origin is that reported by the SEA. Errors in the name of the country, designation, or spelling have resulted in an inflated count of countries (see footnote 1 on Table IV-4). For example, some SEAs reported "England" as the country of origin, while other SEAs used "United Kingdom." Some SEAs used ethnicity instead of the name of the country, e.g., "Hmong" is listed as a country of origin.

Table IV-4

NUMBER OF ELIGIBLE STUDENTS BY COUNTRY OF ORIGIN
IMMIGRANT PROGRAM
1988-89 AND 1989-90

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Afghanistan	1,497	.40	1,550	.33	3
Algeria	12	<.01	39	.01	225
Albania	31	.01	14	<.01	-55
Angola	22	.01	44	.01	100
Antigua	165	.04	223	.05	35
Antilles	1	<.01	1	<.01	0
Arabia	18	<.01	103	.02	472
Argentina	975	.26	1,176	.25	21
Armenia	5,282	1.41	7,810	1.65	48
Aruba	6	<.01	1	<.01	-83
Australia	171	.05	204	.04	19
Austria	94	.03	102	.02	9
Azores	19	.01	25	.01	32
Bahamas	238	.06	153	.03	-36
Bahrain	18	<.01	16	<.01	-11
Bangladesh	728	.19	927	.20	27
Barbados	640	.17	630	.13	-2
Belgium	133	.04	179	.04	35
Belize	271	.07	313	.07	16
Bermuda	38	.01	53	.01	39
Bolivia	1,838	.49	1,991	.42	8
Botswana	17	<.01	8	<.01	-53
Brazil	1,621	.43	1,943	.41	20
Brunei	5	<.01	9	<.01	80
Bulgaria	94	.03	110	.02	17
Burma	185	.05	210	.04	14
Cambodia	9,473	2.54	12,859	2.72	36

Table IV-4, (Continued)

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Cameroon	52	.01	50	.01	-4
Canada	1,104	.30	1,237	.26	12
Cape Verde	705	.19	807	.17	14
Cayman Islands	1	<.01	3	<.01	200
Central Africa	5	<.01	26	.01	420
Chad	13	<.01	20	<.01	54
Chile	483	.13	606	.13	25
China	12,549	3.36	11,872	2.51	-5
Colombia	4,652	1.25	5,272	1.11	13
Costa Rica	1,429	.38	2,180	.46	53
Croatia	0	.00	10	<.01	
Cuba	520	.14	4,010	.85	671
Czechoslovakia	196	.05	147	.03	-25
Denmark	165	.04	215	.05	30
Djibouti	11	<.01	10	<.01	-9
Dominica	58	.02	1,890	.40	3159
Dominican Republic	15,751	4.22	14,885	3.15	-6
Ecuador	2,325	.62	2,588	.55	11
Egypt	459	.12	477	.10	4
El Salvador	21,308	5.71	26,038	5.50	22
England	317	.08	327	.07	3
Ethiopia	1,034	.28	1,144	.24	11
Fiji	21	.01	21	<.01	0
Finland	108	.03	139	.03	29
France	699	.19	790	.17	13
French Giana	6	<.01	1	<.01	-83
Gabon	6	<.01	2	<.01	-67
Gambia	34	.01	39	.01	15
Germany	1,527	.41	1,563	.33	2
Ghana	717	.19	334	.07	-53
Greece	1,265	.34	1,478	.31	17
Grenada	450	.12	396	.08	-12
Guadeloupe	6	<.01	31	.01	417

Table IV-4, (Continued)

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Guam	3	<.01	8	<.01	167
Guatemala	6,292	1.68	11,367	2.40	81
Guyana	4,262	1.14	4,783	1.01	12
Haiti	6,374	1.71	9,887	2.09	55
Hmong	573	.15	1,720	.36	200
Holland	115	.03	125	.03	9
Honduras	3,017	.81	5,073	1.07	68
Hong Kong	2,026	.54	2,080	.44	3
Hungary	278	.07	363	.08	31
Iceland	20	.01	20	<.01	0
India	5,844	1.56	6,274	1.33	7
Indonesia	743	.20	1,087	.23	46
Iran	2,315	.62	2,786	.59	20
Iraq	260	.07	224	.05	-14
Ireland	497	.13	700	.15	41
Israel	2,097	.56	2,089	.44	-1
Italy	944	.25	1,040	.22	10
Ivory Coast	14	<.01	15	<.01	7
Jamaica	6,293	1.69	7,825	1.65	24
Japan	4,028	1.08	4,489	.95	11
Jordan	417	.11	546	.12	31
Kenya	138	.04	179	.04	30
Korea	12,435	3.33	14,529	3.07	17
Kuwait	159	.04	235	.05	48
Laos	12,653	3.39	16,662	3.52	32
Lebanon	1,296	.35	1,510	.32	17
Lesotho	24	.01	5	<.01	-79
Liberia	325	.09	401	.08	23
Libya	87	.02	119	.03	37
Lithuania	15	<.01	41	.01	173
Macua	18	<.01	24	.01	33
Malagasy	1	<.01	3	<.01	200
Malawi	13	<.01	10	<.01	-23

Table IV-4, (Continued)

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Malaysia	662	.18	812	.17	23
Mali	3	<.01	4	<.01	33
Martinique	5	<.01	0	.00	-100
Mexico[3]	122,769	32.87	149,284	31.56	22
Midway	2	<.01	0	.00	-100
Morocco	46	.01	66	.01	43
Mozambique	25	.01	17	<.01	-32
Namib	9	<.01	0	.00	-100
Nepal	40	.02	35	.01	-13
Netherlands	174	<.01	103	.02	-41
New Guinea	13	1.79	14	<.01	8
New Zealand	77	.15	119	.03	55
Niger	12	.03	15,274	3.23	127183
Nicaragua	6,697	<.01	17	<.01	-100
Nigeria	568	.15	700	.15	23
Norway	122	.03	232	.05	90
Omdpnesoa	3	<.01	0	.00	-100
Pakistan	3,103	.83	3,968	.84	28
Palestine	11	<.01	10	<.01	-9
Panama	935	.25	2,220	.47	137
Paraguay	200	.05	246	.05	23
Peru	2097	.56	2,671	.56	27
Philippines	14,295	3.83	17,708	3.74	24
Poland	3,197	.86	3,869	.82	21
Portugal	4,068	1.09	4,428	.94	9
Qatar	269	.07	2,799	.59	941
Puerto Rico	153	.04	4	<.01	-97
Rhodesia	1	<.01	1	<.01	0
Romania	1,398	.37	1,496	.32	7
Russia	1,333	.36	2,628	.56	97
Saint Croix	2	<.01	2	<.01	0
Saint Lucia	91	.02	117	.02	29
Saint Martin	5	<.01	8	<.01	60

Table IV-4, (Continued)

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Saint Paul	1	<.01	1	<.01	0
Saint Thomas	1	<.01	1	<.01	0
Saint Vincent	61	.02	153	.03	151
Santo Domingo	3	<.01	1	<.01	67
Saudi Arabia	428	.11	576	.12	35
Scotland	18	<.01	21	.01	61
Senegal	9	<.01	49	.01	444
Sierra Leone	177	.05	202	.04	14
Singapore	501	.13	701	.15	40
Somalia	182	.05	73	.02	-60
South Africa	262	.07	393	.08	50
Spain	1,875	.50	2,560	.54	37
Sri Lanka	154	.04	216	.05	40
Sudan	168	.04	205	.04	22
Surinam	24	.01	60	.01	150
Swaziland	5	<.01	3	<.01	-40
Sweden	122	.03	173	.04	42
Switzerland	99	.03	136	.03	37
Syria	294	.08	360	.08	22
Taiwan	7,642	2.05	10,624	2.25	39
Tanzania	50	.01	50	.01	0
Thailand	3,830	1.03	5,067	1.07	32
Tonga	132	.04	109	.02	-17
Trinidad	1,430	.38	2,029	.43	42
Truk	3	<.01	2	<.01	-33
TIPI	1	<.01	1	<.01	0
Tunisia	5	<.01	4	<.01	-20
Turkey	318	.09	358	.08	13
Ukrania	5	<.01	24	.01	380
Uganda	22	.01	28	.01	27
United Kingdom	492	.13	1,009	.21	105
Uruguay	259	.07	341	.07	32
Venezuela	665	.18	976	.21	47

Table IV-4, (Continued)

Country of Origin[1]	No. Imm. Students 1988-89[2]	Percent of Total	No. Imm. Students 1989-90	Percent of Total	Percent Change SY 88-90
Vietnam	22,703	6.08	27,139	5.74	20
Virgin Islands	79	.02	189	.04	139
Wales	1	<.01	0	.00	-11
West Germany	12	<.01	217	.05	1708
Western Samoa	528	.14	192	.04	-64
West Indies	840	.22	1,730	.37	106
Yemen	601	.16	654	.14	9
Yugoslavia	836	.22	858	.18	3
Zaire	38	.01	63	.01	66
Zambia	32	.01	40	.01	25
Zimbabwe	5	<.01	11	<.01	120
Other	1004	.27	1,103	.23	10
TOTAL	373,446	100.00	473,082	100.00	27

Source: SEA Biennial Reports for 1988-89, 1989-90, OBEMLA.

1. The Country of Origin is shown here as reported by the SEA. Errors in the name of the country, designation, or spelling have been included to show the quality of the data being reported by SEAs. For example, some SEAs reported "England" as the country of origin, while other SEAs used "United Kingdom." Some SEAs used ethnicity instead of the name of the country, e.g., "Hmong" is listed as a country of origin.

2. This is the number reported by SEAs in their biennial reports. The number reported here may be larger or smaller than the number of eligible students reported by the SEAs on their applications.

3. Several SEAs grouped countries together when reporting numbers of immigrant students, e.g., "Mexico, Panama, and Spain = 436 students." Since it was not possible to disaggregate the numbers for each country, the total number of students in the group was assigned to the first country of the group.

There is evidence that LEAs are reporting test scores, attendance, program activities, and curriculum materials to SEAs, but this detailed information has not been reported to OBEMLA or to any other Federal office. For example, both Dearborn and Hamtramck (Michigan) school districts send evaluation reports to the Michigan SEA. In Hamtramck, however, the formal evaluation is of the Title VII program. Other information on the Immigrant Program, such as dropout rate, student achievement, and test scores is collected and submitted to show efficacy of the Immigrant Program. Dearborn provides pre- and post-test scores in Math and English, along with the student's name, grade, school, and number of years in the Bilingual Program. The type of service the student received, the number of hours of bilingual services received per week, and other data also are sent to the State in the annual report.

According to OBEMLA files, Arizona and California are the only two States to have submitted final performance reports. In 1988, Arizona submitted final performance reports for both the Immigrant and Refugee Programs, but no project outcomes were included. The 1988 Immigrant Program Performance Report from Arizona indicated that 17 school districts applied for funding and two eligible districts declined to apply. The report stated that a major portion of the LEA program funds was spent on instructional supplies and materials, supplemental instructional staff, and staff development. The report also said that the majority of districts offered some kind of ESL program.

In 1984, and again in 1988, California submitted final performance reports for the Immigrant Program, which included brief reports from each LEA describing the services provided and the extent to which the LEA met its objectives. However, the only project outcomes reported pertained to the numbers of students or teachers participating in particular activities.

2. Refugee Program

No information on outcomes from the Refugee Program was reported by SEAs to OBEMLA. The EDGAR requirements for annual performance reports applied to SEAs receiving Refugee Program grants as it did for SEAs receiving Immigrant Program grants; however, it appears no annual reports were ever submitted to OBEMLA.

Although SEAs did not submit annual performance reports to the Federal government, SEAs did receive annual reports from their subgrantees. All 42 SEAs (100 percent) reported receiving performance evaluation reports from the LEAs for school year 1989-90. SEAs reported using the reports to 1) Prepare statewide evaluations; 2) inform State policymakers; 3) identify program strengths and weaknesses; and 4) comply with Federal regulations.

V. LOCAL PROGRAM OPERATION

V. LOCAL PROGRAM OPERATION

Local education agencies (LEAs) are SEA subgrantees, which receive Federal funds and administer the Immigrant or Refugee Programs in local communities. In general, LEAs operate the programs according to Federal and State requirements, as described in Sections III and IV. The strategies LEAs use to implement program services, however, often are tailored to the specific needs of the immigrant and refugee student populations in the community. It is at the local level that program goals actually are achieved, in that immigrant and refugee students and their families are served in a variety of innovative and responsive ways that enable academic achievement, social acculturation, and hope for a secure future.

This section incorporates data from the GAO survey on the Immigrant Program, the COSMOS survey on the Refugee Program, and excerpts from case studies of the 15 sites chosen for their effective practices in serving immigrant students. Together these data sources provide a variety of practices and strategies used to implement the two programs at the local level. The case studies in Volume II enrich these data by offering more detailed examples of effective practices. The administrative structures for providing services to immigrant students, characteristics of students served, range of program services provided, and outcomes of each program at the local level are described.

A. Program Administration and Expenditures

1. Immigrant Program

LEAs that receive Immigrant Program subgrants administer them through a district-level office established to handle several Federal- and/or State-funded programs. These programs usually provide bilingual, ESL, or other compensatory services funded under Title VII, Chapter I, or special State programs. The names of the offices vary across districts, as shown by the following selected examples from the 15 LEAs visited during this study:

- Office of Bilingual Education;
- Office of Curriculum, Staff, and Project Development;
- Bilingual Program Office;
- Language Minority Affairs Office;
- Office of Emergency Immigrant Education Assistance; and
- ESL/Bilingual Programs;

In some cases the administrative offices at the LEA are set up almost exclusively to serve immigrant students, e.g., the Bilingual Program Office at Los Angeles Unified School District and the Division of ESOL/Bilingual Programs in Montgomery County, Maryland. In other districts, the LEAs serve a population defined by its English language minority status, which often includes--but is not restricted to-- immigrants.

The coordinator for ESL or bilingual education typically will also serve as the LEA's coordinator for the Immigrant Program. The role of the Immigrant Program coordinator is a part-time responsibility, except perhaps in the largest districts such as New York City or Los Angeles. The ESL coordinator attends to Immigrant Program matters as needed, e.g., conducting the annual census or approving expenditures of program funds. The amount of funding usually is smaller than funding for other district programs, and accounting for funds is simpler. For example, in the District of Columbia, the Language Minority Affairs office keeps the records of expenditures from the EIEA program in a three-ring binder. The binder contains the grant application, the budget breakdown (funding for testing and assessment, training, orientation program, and curriculum development), and receipts of expenditures. Regardless of the method used, most of the sites kept records of expenditures for fiscal tracking purposes rather than for planning purposes.

Beginning in 1989, SEAs required LEAs to report their expenditures of Immigrant Program funds and in turn passed along these totals to OBEMLA in biennial reports. Tables V-1 and V-2 summarize the proportion of Immigrant Program funds spent by LEAs in different cost categories for 1988-89, and 1989-90, respectively. The average allocation of grant expenditures for 1988-89 across all LEAs was:

Expenditure Category	Percent of Allocation
English language instruction	48.7 percent
Other bilingual instruction	23.7
Special materials or supplies	7.2
In-service training	5.2
Class supplies	3.3
Overhead	3.2
Other educational services	2.8
Transportation	2.0
Other basic services	1.3
State administrative costs	1.3
Construction	0.6
Space rental	0.5

As case-specific examples, both Hamtramck and Dearborn, Michigan, Los Angeles, and Hawaii used all EIEA funds, either directly or indirectly, for instructional purposes. Examples of these instructional purposes include salaries of bilingual teachers and aides, staff training, supplies, and materials. Similarly, Stockton Unified School District in California spends the majority of EIEA funds for academic instructional services ($248,988) and the remainder on teacher training ($3,122) and administration ($17,643). In Federal Way, Washington, EIEA funds were used entirely for direct expenditures on materials. Most of the sites spent some money on both instructional and supplementary instructional services.

Table V-1

PERCENT OF LEA EXPENDITURES OF IMMIGRANT PROGRAM GRANTS BY STATE AND CATEGORY 1988-89

STATE	English Lang. Instruc.	Other Biling. Instruc.	Special Material /Suppls.	Other Educ. Services	Class Supplies	Overhead Costs	Construction	Space Rental	Transp.	Basic Services	Other In-service Training
Arizona	50.2%	3.3%	7.1%	9.5%	9.0%	6.4%	0.0%	0.0%	2.4%	5.7%	5.1%
California	47.6	27.8	6.4	0.3	1.0	4.2	1.0	0.7	2.6	0.3	6.5
Colorado	90.3	0.0	0.0	6.9	2.2	0.6	0.0	0.0	0.0	0.0	0.0
Connecticut	66.2	6.5	6.3	0.1	12.0	6.2	0.0	0.0	0.0	0.0	1.2
District of Col.	12.6	0.0	0.6	6.0	29.6	0.0	0.0	0.0	5.2	42.1	3.9
Florida	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Georgia	42.6	0.0	0.0	0.0	15.3	0.0	0.0	0.0	9.0	33.1	0.0
Hawaii	4[illegible].2	14.6	1.1	0.0	22.3	3.2	0.0	0.0	0.9	6.5	3.7
Illinois	60.3	6.6	3.7	0.8	7.8	4.5	0.0	0.0	0.5	0.4	15.0
Kansas	88.3	0.0	0.0	1.1	4.6	0.0	0.0	0.0	0.0	4.1	1.0
Louisiana	38.6	26.6	5.7	13.6	2.4	3.6	0.0	0.0	0.7	4.6	2.7
Maryland	80.3	0.0	9.5	8.4	0.0	0.4	0.0	0.0	0.3	0.3	0.8
Massachusetts	21.1	45.9	9.2	9.5	5.3	0.1	0.0	2.6	1.2	0.9	2.7
Michigan	40.8	29.7	5.4	6.2	4.1	0.0	0.0	0.0	0.0	11.2	0.5
Minnesota	29.1	69.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Missouri	0.0	64.4	6.5	0.0	0.0	0.0	0.0	0.0	22.1	7.1	0.0
New Jersey	11.4	17.4	20.6	24.0	16.3	0.0	0.0	0.0	1.0	3.6	4.9
New Mexico	48.9	2.1	13.7	0.0	16.7	2.0	0.0	0.0	4.3	1.3	10.9
New York	41.2	32.0	14.0	2.0	4.6	1.2	0.0	0.5	1.3	0.3	0.9
Ohio	65.8	0.0	13.5	0.0	6.7	1.4	0.0	0.0	0.0	0.0	11.1
Oklahoma	0.0	5.0	8.6	0.8	26.1	0.0	0.0	0.0	1.5	0.0	16.0
Oregon	72.9	0.0	15.5	4.0	0.0	0.0	0.0	0.0	0.2	6.0	1.0
Pennsylvania	98.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	96.3	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0	0.0	0.0
Tennessee	49.6	22.1	8.7	11.2	0.0	2.4	0.0	0.0	0.0	0.0	4.9
Texas	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Utah	82.7	11.9	0.4	3.7	0.4	0.0	0.0	0.0	0.6	0.3	0.0
Virginia	84.6	0.0	1.8	9.8	0.0	1.1	0.0	0.0	0.0	0.0	0.9
Washington	69.4	18.8	1.2	8.8	0.1	0.6	0.0	0.0	0.7	0.5	0.0
Wisconsin	16.9	23.6	28.2	29.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	63.8	0.0	0.0	26.4	6.8	0.0	0.0	0.0	1.9	1.1	0.0
TOTAL	48.7	23.7	7.2	2.8	3.3	3.2	0.6	0.5	2.0	1.3	5.2

n/a = not available

Source: SEA Biennial Reports for 1988-89 and 1989-90, OBEMLA

Table V-2

PERCENT OF LEA EXPENDITURES OF IMMIGRANT PROGRAM GRANTS BY STATE AND CATEGORY 1989-90

STATE	English Lang. Instruc.	Other Biling. Instruc.	Special Material /Suppls.	Other Educ. Services	Class Supplies	Overhead Costs	Construc-tion	Space Rental	Transp.	Basic Services	Other In-service Training
Arizona	44.3%	9.7%	13.3%	12.6%	5.1%	4.7%	0.0%	0.0%	1.1%	6.8%	2.2%
California	56.8	21.1	4.9	0.6	3.1	4.4	0.2	0.9	2.7	0.5	2.9
Colorado	91.4	0.0	0.0	3.3	5.4	0.0	0.0	0.0	0.0	0.0	0.0
Connecticut	67.6	7.5	5.8	2.1	8.9	4.9	0.0	0.0	0.3	0.0	1.3
District of Col.	2.7	0.0	0.7	2.5	44.2	0.0	0.0	0.0	7.8	36.5	5.5
Florida	84.2	7.4	2.0	0.0	1.5	0.0	0.0	0.0	0.0	0.6	1.9
Georgia	29.2	0.0	0.0	0.0	54.9	0.0	0.0	0.0	5.9	6.3	3.3
Hawaii	45.7	22.4	11.4	0.8	11.0	1.2	0.0	0.0	1.4	3.2	1.2
Illinois	5.5	13.2	7.3	0.7	54.8	3.4	0.0	0.0	0.1	0.9	14.0
Kansas	97.9	0.0	0.0	2.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Louisiana	37.6	21.1	2.2	24.0	1.2	2.3	0.0	0.0	1.5	5.5	3.3
Maryland	74.6	0.0	4.0	20.2	0.0	0.0	0.0	0.0	0.0	0.0	1.2
Massachusetts	56.2	18.4	5.5	5.0	4.9	0.1	0.0	2.2	1.4	2.1	2.7
Michigan	43.3	22.9	6.2	9.6	11.7	0.6	0.0	0.0	0.0	0.3	3.9
Minnesota	25.7	72.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Missouri	64.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	30.1	5.8	0.0
New Jersey	22.3	29.8	14.0	22.4	8.0	0.0	0.0	0.0	0.8	1.5	0.8
New Mexico	35.3	7.7	15.7	4.7	17.7	3.5	0.0	0.0	3.3	0.0	12.2
New York	41.3	33.4	10.6	0.5	7.4	1.3	0.0	0.3	1.3	0.0	2.2
Ohio	54.7	4.0	5.1	0.0	0.0	0.8	0.0	0.0	0.0	0.0	4.9
Oklahoma	0.0	24.2	2.8	4.5	12.8	0.0	0.0	0.0	0.0	4.4	2.4
Oregon	73.1	0.0	14.9	1.0	6.5	0.0	0.0	0.0	0.0	4.3	0.1
Pennsylvania	98.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	62.0	1.1	0.0	22.5	10.6	3.8	0.0	0.0	0.0	0.0	0.0
Tennessee	33.7	43.9	2.7	16.0	3.7	0.0	0.0	0.0	0.0	0.0	0.0
Texas	38.3	12.5	3.2	11.6	6.9	0.4	20.4	0.0	0.6	5.0	1.2
Utah	83.6	9.4	1.1	3.4	0.0	0.0	0.0	0.0	0.6	0.4	0.0
Virginia	77.0	0.0	3.3	15.9	0.0	1.3	0.0	0.0	0.0	0.0	1.0
Washington	69.5	9.4	0.8	14.1	1.4	1.4	0.0	0.0	0.3	0.6	0.4
Wisconsin	43.3	4.5	32.6	18.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	50.7	0.0	0.0	43.1	0.0	0.0	0.0	0.0	1.2	4.6	0.4
TOTAL	51.0	19.0	5.8	4.3	7.1	2.7	1.9	0.5	1.8	1.6	2.9

n/a = not available

Source: SEA Biennial Reports for 1988-89 and 1989-90, OBEMLA

LEA and SEA communications concerning the Immigrant Program can be informal and infrequent or structured and routine. In some States, the SEA provides technical assistance, guidance, or recommendations on curriculum ortesting instruments at the request of the LEA. In these instances, communications between the two administrative levels are based on the nature and level of demonstrated need and the response to that need. Some relationships merely consist of an informal exchange of information at State conferences, or at countywide training workshops. In the more structured relationships, meetings are scheduled in advance and tend to cover a broad spectrum of issues, from financial concerns to program content and evaluation procedures.

2. Refugee Program

During the 1989-90 school year, the Refugee Program was administered by LEAs through the same district office that administered other bilingual or language minority programs. At the local level, a variety of staff are involved in program activities, usually supervised by an overall program coordinator. The COSMOS survey found that the Refugee Program coordinator had served in that capacity for an average of five years and spent an average of 14 percent of his or her time administering the program. The Refugee Program coordinator also served as coordinator for the Title VII Bilingual or the ESOL program and, in approximately 70 percent of the responding districts, was coordinator for the Chapter I program as well. The coordinator was responsible for non-teaching aspects of the program, e.g., submitting grant applications, discussing program operations with SEA staff, and arranging non-instructional support services for students. Teachers were primarily responsible for determining program priorities, conducting the annual count of refugee students, and selecting or developing instructional materials. Teachers and other instructional staff shared responsibility for assessing student needs, and the LEA financial staff maintained the financial records of the program's activities.

B. Program Targeting and Demographics

1. Immigrant Program

Administering Eligibility Counts. The SEAs interpret the statutory definition of eligibility for the Immigrant Program in their States (see Section IV). LEAs, in turn, put this definition into practice by determining methods for counting students meeting the eligibility criteria. LEAs also conduct the counts and use the resulting data for preparing reports for the SEA, planning programs and staff positions, and requesting funding through grant applications.

The actual sites visited use different methods to conduct eligibility counts. Most frequently, however, the districts have established specific registration procedures for all students whose country of origin is not the United States, or whose primary language is not English. It is through these procedures, often conducted in an ESL or bilingual program office, that a range of data is determined. These data include home language, date of entry into the United States, academic background, ethnic status, country of origin, and level of English proficiency. The specific registration procedures vary across the sites and determine the methods each of the districts use to conduct the counts of immigrant students. As a detailed example, when a parent or guardian registers a student in Federal Way, the school secretary asks the parent to identify the primary language spoken in the home. If the language is not English, the parent/guardian and student are sent to the Transitional Bilingual Program (TBP) district coordinator after the initial registration form has been completed. The TBP district coordinator interviews the parent and student to collect information about home language, date of entry into the United States, and educational background. The coordinator finalizes the process by completing a form on the student for her records.

Resulting Eligibility Data. There were 136,000 eligible immigrant students in districts in 1989-90 not receiving Immigrant Program funds according to GAO (1991). These students were dispersed among 4,000 school districts or 89 percent of the nation's total districts. The GAO concluded that about 90 percent of these estimated 4,000 districts were not eligible for funding because there were fewer than 500 eligible immigrant students, or they represented less than 3 percent of the total school population. The GAO report goes on to say that 60 percent of the districts not receiving funds during school year 1989-90 had fewer than 10 immigrant students.

Almost all of the remaining 10 percent (400 districts) that did not receive funding in school year 1989-90 were eligible because their immigrant students represented more than 3 percent of the district's total school enrollment. Very few districts had 500 or more eligible immigrant students, however. None of these 400 school districts applied for funding through the Immigrant Program. When questioned, officials from these districts said they were not aware of the Immigrant Program. Other officials thought their districts were ineligible for funding. Still others said they lacked the resources to identify immigrant students or gave other reasons for not applying.

An important issue then is whether the LEAs are either underestimating or overestimating the actual number of students eligible for Immigrant Program services. Overall, most of the sites visited by the study team did not report any underestimation of eligible students. A few sites, however, reported potential gaps in current counting procedures or mentioned strategies being implemented to ensure accurate counting. For example, the Federal Way School District (Washington) thinks it has identified all EIEA eligible students in the public schools but does not have an accurate count of those attending private schools. In addition, the District of Columbia currently is in the process of implementing a new survey to identify all EIEA-eligible students because some students bypassing the registration process for foreign-born students were being missed in the count. Most of the districts visited willingly admitted that their methods for determining immigration status were not foolproof but were "the best we can do."

Student Needs and Characteristics. According to the GAO Report on Immigrant Education, the grade levels of EIEA students were as follows:

- One percent of the EIEA students were in prekindergarten (ages 2 through 4);
- Sixty percent were in the elementary grades (ages 7 through 12);
- Eighteen percent were in the middle school grades (ages 13 through 15); and
- Twenty-one percent were in high school (ages 16 through 18). (Note: Students are normally within these age ranges when enrolled at these grade levels.)

The educational and social needs of EIEA students were also assessed as part of the GAO Questionnaire to school districts receiving EIEA grants for the 1989-90 school year. School districts were asked to indicate the percentage of EIEA students with educational needs in the following areas: (1) English language instruction, (2) instruction in other academic subjects in the students' native language, (3) native language instruction intended to maintain or develop native language skills, (4) remediation in basic academic skills, (5) tutoring in other academic subjects, and (6) evaluation or placement testing.

School districts responding to the 1989-90 GAO Questionnaire identified the three most critical needs relating to education for EIEA students as:

- Language instruction (reported by almost 64 percent, or 286 school districts);
- Other instruction in the native languages of EIEA students (reported by almost 33 percent, or 147 school districts);
- Basic skills remediation (reported by 13 percent, or 60 school districts).

In the 1989-90 GAO survey, the most critical social needs (identified by at least 30 percent of the districts for 80 percent to 100 percent of EIEA students) were:

- The need for acculturation;
- The need for orientation in fundamental behavioral expectations at school; and
- The need for physical health treatment and screening.

Other social needs were identified, as follows:

- Mental health screening and counseling for other mental health problems (48 percent of responding school districts reported that approximately 1 percent to 19 percent of EIEA students needed such services);
- Outside mental health services (50 percent of responding school districts reported that approximately 1 percent to 19 percent of EIEA students needed such services);
- Career counseling (23 percent of responding school districts reported that approximately 80 percent to 100 percent of EIEA students needed counseling); and
- Assistance in obtaining physical health treatment and/or screening (12 percent of responding school districts reported that approximately 80 percent to 100 percent of EIEA students needed such services).

Other sources of information provide comparisons to the above data reported by GAO. One report conducted with limited English proficiency (LEP) students indicated that these students have the following needs for social, psychological, and educational services (HOPE, 1984):

- Linguistic needs to develop a fully functional capability to think, learn, and communicate in English;
- Academic needs to reinforce their cultural identity and self-concept while learning English, as well as to receive remedial instruction to attain age parity in academic skills;
- Social needs for teachers and administrators who understand immigrant students in terms of manners, body language, diet, attitudes on social relationships, religion, morality; and
- Counseling needs regarding behavioral expectations in school and for assistance to families to encourage students at school and in securing food, clothes, and other social and health services.

These findings are relatively consistent with the GAO findings.

In addition, most of the sites visited identified learning English to be the most important skill required by immigrant students. This finding is echoed by the March 1991 GAO Report on Immigrant Education, which reports that 90 percent of the EIEA-eligible students in 1989-90 were identified as having limited English proficiency, while 10 percent were identified as being proficient in English language skills.

Cultural Backgrounds of Immigrant Students. According to INS data, about 44 percent of legal immigrants in 1990 were from Mexico, 23 percent from the Caribbean and Central and South America, 22 percent from Asia, 7 percent from Europe, 2 percent from Africa, and 2 percent other (U.S. Department of Commerce, 1992). Over time, the percentage distribution of legal immigrants between 1981 and 1989 is estimated to be 43 percent from Asia; 25 percent from the Caribbean and Central and South America; 17 percent from Mexico; 10 percent from Europe; almost 3 percent from Africa; and 2 percent from other countries (U.S. Department of Commerce, 1992).

In comparison to this national data, the GAO Report on Immigrant Education reported that 60 percent of the EIEA-eligible students during 1989-90 were Hispanic; 22 percent were Asian; 8 percent were white, non-Hispanic; 6 percent were black, non-Hispanic; 2 percent were Pacific Islanders, and 2 percent were of other extraction. The academic and social impact of immigration on students is often revealed through differences in school cultures between their home and host countries. For example, immigrant students from the Far East are accustomed to a rigorous class lecture environment with little interaction in class (NCAS, 1988; Olsen, 1988). Another example is provided from a study on Cuban refugees' impact on Dade County Public Schools (Silva, 1985), which indicates that the Marxist education students receive in Cuba is extremely different in terms of both educational materials covered and methodology.

2. Refugee Program

Administering Eligibility Counts. LEAs conducted the annual count of eligible refugee students in much the same way as they conducted the annual count of immigrant students described above. Approximately 60 percent of the LEAs used the Federal definition for an eligible refugee student, approximately 15 percent used the State definition, and approximately 26 percent used some other definition.

LEAs typically notify each of their schools of the need to conduct the student count and provide the schools' bilingual/ESL teachers with instructions for conducting the count. In the survey, LEAs described either their initial determination of refugee status when students entered the district; or their annual count process for determining student eligibility for the Refugee Program (multiple responses allowed):

- Enrollment/Registration. Sixty-eight school districts (30 percent) specifically mentioned students' initial enrollment or registration into the district as the major opportunity the district uses to determine refugee status and/or eligibility. Many districts reported that they have an Intake Center in which counselors are on hand to answer preliminary questions about the student, such as date of entry into the United States and country of origin.

- Principal/School. Sixty school districts (26 percent) delegated the determination of refugee status to the school level, and ultimately this responsibility fell to the principal.

- Database. Forty-one school districts (18 percent) mentioned the existence of a computerized database that is used in conducting the annual count of refugee students eligible for TPRC. Typically, students' date of entry into the U.S. is collected upon enrollment. This information is then entered into a computerized database, with yearly counts easily accessible.

- Parent. Twenty-six school districts (11 percent) used parent information to determine students' refugee status upon initial enrollment into the district and date of entry into the United States.

- Home Language Survey. Twenty-five school districts (11 percent) relied on the Home Language Survey, administered to newly registered students, to determine whether or not students could be classified as refugees.

- District Office. Twenty-three school districts (10 percent) reported that responsibility for determining the annual count of refugee students was delegated to a particular district office, such as the ESL Department, Bilingual Office, or Student Services.

- I-94 Cards. Twenty-three school districts (10 percent) specified that in order to classify a student as a refugee they must see his or her I-94 card upon enrollment. The I-94, or Arrival/Departure Document, is issued to refugees at the port of entry into the U.S., or in refugee camps or processing centers before arrival into the U.S.

- Student Records. Fifteen school districts (7 percent) consulted student data records annually to determine if students were still eligible for the TPRC program, given their date of arrival into the U.S.

- Survey. Fourteen school districts (6 percent) utilized survey data other than the Home Language Survey to determine refugee status. Typically these surveys were conducted annually by the district.

- Students. Eight school districts (4 percent) relied on student self-report data about their country of origin or date of arrival into the U.S. to determine the annual count of refugee students.

- Other. Eighteen school districts (8 percent) reported other ways of determining whether a student was a refugee or if he or she was eligible for the TPRC. These included examination of Green Cards, the I-551 card issued by the Department of Immigration and a basic identity document for immigrants, and the use of help outside of the district, such as the Refugee Processing Company utilized by one district.

Resulting Eligibility Data. Respondents indicated that public elementary schools served an average of 92 of 109 eligible refugee students, while private elementary schools served an average of eight out of eight eligible students. The largest LEAs reported public elementary schools serving up to 1,269 refugee students out of a possible 2,544 eligible refugee students and private elementary schools serving up to 240 students out of a possible 240 eligible.

LEAs reported that public schools at the secondary level served an average of 67 refugee students of a possible 75 eligible students, and private secondary schools served three out of four eligible students. A review of SEA applications for 1989 shows that the number of eligible children for the Refugee Program ranged from one in Culver City, California, to 8,495 in Dade County, Florida, which is the fourth largest school district in the United States. The second largest

LEA count was 7,497 students in Los Angeles, California, which is the second largest school district in the United States. The average number of refugee students in each participating LEA is approximately 181. A complete listing of the refugee student enrollments reported by LEAs for 1989 is presented in Appendix B. The reader should remember that LEAs with fewer that 20 eligible students may not have reported students for the SEA annual application and that the 74,229 student total (as shown in Appendix B) is a lower range number.

One important issue for the program is the extent to which LEAs may overreport or underreport the number of eligible students. Approximately 22 percent of the respondents said that there were eligible children in the district who were not identified as eligible in the annual student count. Half of those stating that eligible children were missed in the annual count said the reason was that the parents did not want the student to be reported as a refugee. The same proportion said that students were not reported because teachers or staff overlooked them, and about 30 percent of those LEAs with missed students said that the person making the count made errors in the process.

Student Needs and Characteristics. In an effort to better educate students, LEAs conduct assessments of student academic and support needs at various points in the education process. Approximately 91 percent of the respondents indicated that their district assessed the academic needs of refugee students as part of the needs assessment for all LEP students in the district. Approximately 79 percent said they assessed academic needs as part of the general needs assessment for all students in the district, and approximately 16 percent said they conducted a special needs assessment for refugee students only. In at least 5 percent of the districts, no needs assessment for refugee students was conducted, either because there were insufficient personnel or inadequate financial resources or because there were too few refugee students.

LEAs were asked to categorize the level of services needed in their district ranging from very critical to not at all critical. The respondents reported that refugee students demonstrated several educational and social needs upon entry into the schools. Acculturation to American culture and social customs was most frequently cited. Other needs cited by more than half the respondents included:

- Understanding behavioral expectations in school;
- Basic academic skills remediation;
- English language instruction only;
- Parents' understanding of school expectations and societal norms; and
- Translation of materials for parents.

It is difficult to determine if the need is viewed as critical because services are not provided--perhaps due to lack of resources--or if the need is viewed as critical because it is being provided. It could be that the LEAs which indicated some needs as being more critical than others did so because they lacked resources to provide them. In turn, districts not viewing these needs as critical might have done so because they already are providing services to fill the need.

Cultural Backgrounds of Refugee Students. Refugee students come from a variety of cultural backgrounds. The highest average number of refugee students across LEAs were reported to come from the following countries: Laos, the Soviet Union, Vietnam, Thailand, Cambodia, Iran, and Mexico. A listing of all countries and the proportion of students from each is presented in Table V-3.

C. Program Services

1. Immigrant Program

Needs Assessments and Program Placements. The most detailed information on needs asessment and program placements was identified during the site visits.

In most of the sites the educational needs of immigrant students are assessed when they register for school. The intake center in the Jersey City, New Jersey school district is completely funded through the Immigrant Program subgrant. Most often these needs are assessed according to the students' level of English proficiency. For example, if the Immigrant Program coordinator at Federal Way determines that the student has limited English proficiency, the coordinator has the student tested in oral reading and written language acquisitions using the Language Assessment Scales (LAS) Standardized Test. Students first are placed in grade and/or courses by chronological age, past educational history, and grade reports, if available, at time of enrollment. If a student scores at 3 or below on the LAS, or has been in other State Transitional Bilingual Programs, he or she is eligible for services under the district's Transitional Bilingual Program (TBP). If the student scores above 3, he or she is placed directly into the mainstream classrooms. This is typical in school districts that have intake and assessment centers for immigrant students.

Foreign exchange students who will be returning to their home country within a specified period of time are not eligible for TBP instruction. The TBP students are assigned to a service center nearest their home, although the center may not be their neighborhood school. Federal Way has adopted ESL as its instructional model, and immigrant students are mainstreamed for large portions of the school day. TBP teachers team with the mainstream teachers to implement a learning plan for the LEP student based on his or her academic needs. TBP teachers may also pull LEP students from the mainstream classes to provide special instruction in English proficiency skills. In its several pilot programs, Federal Way has a goal there will be no pull-outs, and students will be served in the least restrictive environment.

Meeting the Needs. As indicated in Section IV, all program services to eligible immigrant students are provided at the local level. In general, these programs are designed to meet the needs described earlier in this section. GAO reported that Immigrant Program funds were used for a variety of services, including student testing and counseling, activities for parents, and administrative services. These findings are illustrated in more detail below:

- Approximately 70 percent, or 316 responding school districts, used a portion of their EIEA grants for in-class, academic instructional programs.
- Approximately 53 percent, or 239 responding school districts, used a portion of their EIEA funds for academic instruction in pull-out programs, i.e., programs used by schools to provide instructional services to students outside the normal classroom.
- Approximately 12 percent, or 54 respondents, used a portion of their EIEA grants for academic instruction during after-school hours.
- Approximately 15 percent, or 67 respondents, used a portion of their EIEA grant for academic instruction during the summer.
- Approximately 13 percent, or 62 respondents, used a portion of their EIEA grants for academic, non-instructional programs.
- About 35 percent, or 159 respondents, used a portion of their EIEA funding to support programs that were non-academic/non-instructional.

As reported, almost all of the sites visited indicated that the most important educational need of immigrant students is mastery of English. A number of effective practices were identified across sites, targeting the broad categories of:

- Administrative practices;
- Instructional practices;
- Support services;
- Dedicated special programs; and
- Outreach programs.

Table V-3

COUNTRY OF ORIGIN OF REFUGEE STUDENTS, 1989-90 School Year, LEA SURVEY*

Country of Origin As Reported by LEA	Number Elementary Students	Number of LEAs Responding	Number Secondary Students	Number of LEAs Responding	Total Number of Students	Percent of Total Students
Afghanistan	179	35	170	28	349	1.1
Bulgaria	20	16	10	12	30	.1
Cambodia	2,448	90	1,635	95	4,083	13.0
China	410	54	280	41	690	2.2
Colombia	87	27	43	20	130	.4
Cuba	59	17	54	21	113	.4
Czechoslovakia	100	36	48	22	148	.5
El Salvador	281	42	247	35	528	1.7
Ethiopia	176	29	153	28	329	1.1
Fed. Rep. of Germany	75	23	35	17	110	.4
Greece	21	18	8	11	2,916	.1
Guatemala	249	29	137	26	386	1.2
Haiti	113	22	70	16	183	.6
Hungary	48	24	51	25	99	.3
Iran	869	37	646	31	1,515	4.8
Iraq	21	15	12	13	33	.1
Italy	21	19	9	15	30	.1
Japan	110	25	431	25	541	1.7
Laos	3,971	105	2,826	102	6,797	21.7
Lebanon	153	26	122	23	275	.9
Malaysia	31	16	101	17	132	.4
Mexico	543	38	247	34	790	2.5
Nicaragua	231	39	193	37	424	1.4
Philippines	163	36	79	26	242	.8
Romania	277	49	215	42	492	1.6
Sudan	17	12	7	12	24	.1
Syria	23	14	12	13	35	.1
Taiwan	59	23	37	18	96	.3
Thailand	1,085	40	204	27	1,289	4.1
Turkey	112	19	44	16	156	.5
U.S.S.R.	2,498	67	1,645	58	4,143	13.2
Vietnam	3,498	120	3,665	124	7,163	22.8
Others	1,327	70	731	59	2,058	
Total	17,948		13,436		31,384	100.0

*Multiple responses apply across categories. Total N=244. Note: The definition of "refugee" used by LEAs may not always be consistent with the INS definition. See pages III-11 and V-14 for discussion.

Section VI identifies each of the specific practices highlighted at each site and summarizes the impact of the range of practices identified across sites.

Targeting Services. The loose statutory/regulatory language for the EIEA program allows LEAs to use program funds for general purposes rather than for services targeted exclusively on the eligible immigrant children. According to the March 1991 GAO Report on Immigrant Education, about 13 percent of the funded school districts use EIEA funds to provide services that benefit all of their students. Another 39 percent of the funded school districts serve non-immigrant, limited English proficiency, and EIEA students. About 48 percent of the school districts use EIEA funds exclusively for immigrant students.

The most complete information about program services is available for the Immigrant Program in California. There services were targeted primarily to LEP students, teachers, and parents. Supplementary language instruction, bilingual tutoring, counseling, and special summer programs were the major activities conducted by the LEA. Teachers received in-service training, participated in workshops, and attended conferences. Parents received translation services during school-parent interactions. However, it is not known whether all of the counted eligibles received such services, or whether other LEP students (not counted as eligibles) also received such services.

The site visits also revealed that many districts use EIEA funds to benefit a population larger than the immigrant population. In most of these cases, however, the funds serve the language minority, or bilingual populations that contain immigrant students. Some sites provided EIEA-funded services to immigrant students that were truly supplementary to those offered in the regular school program, such as Stockton, which also funds a take-home computer program for immigrant students.

Instructional Methods Employed. Several instructional methods were observed during the site visits. Among the methods highlighted in the case studies are: bilingual instruction, integrated mainstreaming, intensive English language training, native language immersion, and whole language instruction. Most of the sites incorporated one or more of these methods in their programs for immigrants in order to achieve the common goal of English language proficiency for these students. For example, in Nogales, Arizona, bilingual instruction is provided at every grade and language ability. Although class structure and scheduling vary by school, all emphasize continuous flexibility in placing students. Another example of this approach is in Dearborn, Michigan, where every middle school, junior high, and high school and half the elementary schools have full bilingual programs. In comparison, Federal Way, Washington, has adopted ESL as the instructional method for serving all LEP students, who are also mainstreamed for large portions of the school day.

The Los Angeles school district uses supplementary instruction for immigrant students during summer and inter-session vacations. Field trips are used as a way of stimulating students' interest in and enthusiasm for their new surroundings, which will in turn promote a willingness to speak English. The district's philosophy is that language skills are developed most effectively when students have something relevant and exciting to talk about.

2. Refugee Program

A majority (74 percent) of districts reported that there are no students eligible for services who are not receiving them. A quarter of the respondents reported that there are students eligible for services who are not receiving them. The most frequent reason (72 percent) provided for this underestimation of eligible students was insufficient resources at the LEA level. Other reasons were that: refugee students were not in need of services (59 percent); too few eligible students exist in one school (57 percent); and no staff can speak the refugee students' native language (33 percent).

The Refugee Program provides additional resources for much-needed services, especially in districts having large numbers of refugee and immigrant students. Existing budget cuts compound the problem of providing regularly required educational services to students. For many districts, meeting the most basic needs is an essential ingredient for keeping students in school, maintaining their self-esteem, and ensuring their progress. Several activities are addressing these needs, as illustrated by the following:

- Funding additional LEP or bilingual instructors;
- Renting out space to hold classes, as in Los Angeles;
- Keeping the central district intake and assessment center open for appropriate assessment and placement of LEP students, as in Jersey City;
- Providing summer school programs to keep LEP students up to speed and off the streets in some of the poorer LEAs and districts; and
- Providing after-school tutoring programs to keep students in a safe place where they can be productive and receive additional tutoring until parents get home from work.

A significant number of services are focused around language instruction either in or out of the classroom, including instruction in English, native language instruction, bilingual instruction, remediation classes for basic academic skills, and tutoring. Similarly, LEAs identified language instruction to be a critical need for refugee students. The majority of the services the study team saw during the site visits were tailored to acculturation and always coupled with skills achievement.

A variety of instructional and non-instructional services at the elementary and secondary school levels were provided under the Refugee Program. Instructional services were fairly consistent across school levels, and are listed below in descending order according to frequency of response:

- English language instruction;

- Testing and assessment;
- English language tutoring outside of the classroom;
- Remediation classes for basic academic skills; and
- Bilingual instruction.

Non-instructional services were also similar at both the elementary and secondary levels, as listed below:

- Home-school liaison or translation services;
- Acculturation activities;
- Transportation;
- Student guidance counseling; and
- Physical health screening or treatment.

Parental involvement was identified as an important component for students' success, and it is particularly important for parents of refugee students to be able to understand the school culture and the school's expectations of the student. In addition, involvement of parents enables schools to provide information concerning students' rights and community resources to help students and parents. The two primary parental involvement activities cited by more than 40 percent of the LEAs were translation services for parent-teacher meetings or other events and informational meetings for parents.

D. Program Outcomes

At the local level, program outcomes for the Immigrant and Refugee Programs usually are conducted on smaller components of the funded program and are observed using a variety of measurements. These outcomes typically measure program effectiveness by using student achievement indicators and tend to be used for planning. Some examples of measurements include test scores, evaluations of program content, and evaluations of curriculum. The data presented below describe program outcomes at the local level.

1. Immigrant Program

Measurements and Outcomes. The site visits demonstrated several strategies used at the local level to measure the effectiveness of Immigrant Program services. These measurements take the form of test scores, graduation rates, college acceptance rates, and scholarship levels.

In at least one school in Federal Way, students in the Transitional Bilingual Program showed a significant gain in ITBS test scores during a period in which all other students showed a decline. In the District of Columbia, sixth-grade students at Oyster Bilingual Elementary School had test scores on the comprehensive test of basic skills for 1990-91 that ranked nationally in the 85 percent range for reading, 96 percent range for mathematics, 90 percent for language, and 85 percent for science. In Hamtramck, scores on the Michigan Education Assessment Program tests have continued to increase over time. The most recent testing by Dearborn's consultant in Research and Evaluation shows that bilingual students have generally progressed at the rate of 12 months per year. This rate reflects an improvement over former tests, which showed progress at a rate of 10 months per year. Also, in Dearborn, the Immigrant Program has experienced a relatively low dropout rate of 7 percent. Some California LEAs that used Immigrant Program funds to provide language instruction and/or tutoring programs have adopted standardized tests for outcome measures. They conducted pre- and post-tests to demonstrate students' academic and language progress.

At Bell Multicultural High School, also in the District of Columbia, the Class of 1991 was the largest graduating class in the school's history. These students come from 18 different countries and speak 20 different languages. The Class of 1991 earned the highest GPA in the school's history, and in the third advisory, 50 percent of the students made the Honor Roll. Sixty percent of the students had been accepted by colleges, and these students collected $40,000 in scholarships and financial aid.

Other Service Provisions. A study of program outcomes also requires an analysis of both the recipient population and other programs serving similar populations. In many of the sites, students were provided services under a number of Federal programs based largely on their need for academic remediation and assistance with English language acquisition.

In much the same way that students other than immigrants receive services under the Immigrant Program, immigrant students also are receiving services under other programs. According to the 1991 GAO Report, EIEA students also participate in the following Federal programs:

- Chapter I Program for Educationally Disadvantaged Children (280,000 to 370,000 EIEA students);
- Transition Program for Refugee Children (126,000 to 185,000 EIEA students);
- Bilingual Education Act Program (Title VII) (105,000 to 174,000 EIEA students);
- Chapter I Program for Migrant Children (87,000 to 137,000 EIEA students); and
- State Legalization Impact Assistance Grants Program (53,000 to 59,000 EIEA students).

Almost all of the sites also confirmed that immigrant students were being served by programs in addition to EIEA. Programs cited included Chapter I, Title VII, and Free- or Reduced-lunch. Between 30 percent and 100 percent of immigrant students across the sites visited were benefiting from these other programs. A rich example is provided by the District of Columbia, where a variety of Federal projects provide a range of services for immigrant and refugee students, including:

- The Videodisc Literacy Project addresses the needs of language minority junior high school students in English language skills, especially literacy skills and pre-voc-ed training. Combines audio and video, text generation, touch screen and key board manipulation, user control and tracking, small group, and individualized instruction (funded by Title VII, Special Alternative Program);
- Discover D.C. addresses the needs of language minority elementary school students in becoming oriented to their new home, Washington, D.C., through a series of field trips designed to further language acquisition and social integration. A Discovery Squad is made up of six students--three English speakers; and three limited-English speakers. A bilingual teacher is the squad leader (funded by Title VII, Special Alternative Program); and
- The Books Project is conducted to help Salvadoran immigrants become literate both in English and Spanish. Students keep journals and then translate their stories into each language. The stories are compiled to make a book, which when finished are used as readers for students in schools in El Salvador (funded by the Refugee Program).

2. Refugee Program

A little more than one quarter (26 percent) of the LEAs in the survey reported having conducted an evaluation of the Refugee Program. More than three-quarters (76 percent) of these evaluations were done during the 1989-90 school year. Among those LEAs conducting evaluations, most used some type of pre- and post-test to establish improvements in students' performance, and some also used other school performance measures such as attendance or graduation.

The evaluations were done from teacher assessments (and occasionally from performance assessments made by other staff, parents, or consultants). The LEA reported its findings to the SEA in about half of the evaluations.

Fewer than 20 percent of the LEAs stated accomplishments. Those reporting that the Refugee Program had accomplished something in the district indicated there had been changes to the organizational structure of the district, improvements in academic performance, faster mainstreaming of students, improved student attitudes and expectations, and improved teacher attitude and expectations.

LEAs and SEAs were asked to submit copies of any evaluations or outcome reports on their Refugee Program. The project staff reviewed the 49 supplementary reports that were submitted and found that very few of them cited objective data to document claims of improvements in student performance--or even stated student outcomes. Some LEAs simply described the types of services provided and stated that an assessment was done. For example, the "Annual Performance Report" for the Cleveland (Ohio) City School District stated that it served 131 students during the 1989-90 school year. The report also stated that students were assessed in English language proficiency at the time of entry and periodically during the year using the Language Assessment Battery (LAB) test, the basic Elementary Skills Test (BEST) and the Ginn Reading Test. The results were used to plan an individual educational program for each student. To reclassify students, the district used entrance and exit criteria tied to the Reading Expectancy Guidelines for new basal readers used in the English language development curriculum. The report, however, did not give any summary scores or reclassification rates.

Other LEAs described their general instructional and assessment activities but provided far more information on the materials used than on the outcomes from the activities. For example, the Sachem Central School District in Holbrook, New York, included in its "Final Product Evaluation Report" a statement that pre- and post-testing were done to enable teachers to design individualized instruction plans. However, no changes in scores or achievement levels were reported. The report did include a list of the instructional books and materials acquired with the funds, e.g., Sesame Street Magazine, Learn-Language Wall Sets, and the names of supplementary textbooks. Similarly, the Houston (Texas) Independent School District reported in its "Final Report 1989-90" activities such as the 16 parent workshops for 214 participants (mostly Vietnamese parents and family elders).

A few LEAs reported actual student outcomes in summary form only and without explaining the assessment methodology. For example, Memphis Public Schools in Tennessee reported:

> The effectiveness of the ESL and NLI classes offered through this project was evaluated through the review of participating students' report cards. This review of report cards indicated that the activities meet the academic and cultural needs of students. All of the participating students were able to show an increase in their English language acquisition and content area courses. Materials and supplies obtained through this project were evaluated by staff members. These evaluations indicated that the materials and supplies procured were adequate in meeting the needs of the students and instructional objectives of the classrooms.

Even fewer LEAs cited gains in actual test scores or other measures. For example, the Metropolitan Nashville-Davidson County Schools in Tennessee found that 76 percent of the children served by program staff showed a four-point raw score gain on the Oral Proficiency Rating after at least four months of participation. Furthermore, of "the children served by staff funded by the Refugee Program, 83 percent in the elementary school and 96 percent in the high school received grades of C or better in their ESL classes. This percentage indicates that the children are performing well in their ESL classrooms." Similarly, Danbury School District in Connecticut reported in its two-page "Annual Progress Report for FY1989-90:"

> Our program provided the opportunity for our refugee children to make further progress in the local ESL curriculum. Over 90 percent of the children in the program gained one level in a continuum of three levels identified in the curriculum. The local program provided approximately four hours of service per week per child. The paraprofessionals provided an invaluable service in implementing individualized instruction with small groups of children.

And New Haven School Distrct in Connecticut reported:

> Throughout the 1989-90 school year, the center's ESL specialists...provided service to 31 students representing 14 different world cultures and countries... The teachers provided comprehensive instruction in the development of English survival skills and worked to develop the basic academic language skills necessary for students to be integrated as soon as possible with English-dominant mainstream students in content areas such as math, social studies, and science...
>
> ... The goals and objectives stated in New Haven's application were completely achieved. Eighty percent of New Haven's refugee students receiving services on a pull-out basis advanced at least two levels from pre- to post- in the English as a Second Language continuum of skills as measured by the IDEA Proficiency Test (IPT).
>
> Ninety-five percent of the students enrolled in The Multilingual New Arrival Center progressed at least three levels from pre- to post- as measured by the IPT. By February, many of these new entrants had been partially mainstreamed and six of them were among the students who received high honors for academic excellence at the school's award ceremony.

Finally, Moore School District in Oklahoma, was the only LEA that submitted a report containing pre- and post-test scores for individual refugee students (as opposed to scores for all LEP/ESL students) for the 1988-89 school year. For the 24 students served, the average NCE gain on the Language

Assessment Battery was 13.7 points. The gain ranged from a high of 89 by one student to a low of 0.0 by seven students still at the 1.0 post-test level.

The absence of uniform reports of test scores, attendance, and other performance measures at the LEA level--as well as the lack of systematic reporting to SEAs of what measures do exist--prevents the study from drawing any conclusions regarding the outcomes of the Refugee Program for the students receiving services. Based on the limited anecdotal evidence provided above, however, it appears that refugee students were being helped by services the Refugee Program funded in many school districts.

VI. EFFECTIVE PRACTICES FOR SERVING IMMIGRANT STUDENTS

VI. EFFECTIVE PRACTICES FOR SERVING IMMIGRANT STUDENTS

This section discusses the ethnic groups served by the sites visited for the study and the effective practices for serving immigrant students.

Ethnic Groups Served by Sites

The ethnic groups served in the districts that were visited are shown in Table VI-1. This table illustrates the diversity of languages and cultures across sites, and can be compared with Table VI-2 to see which ethnic groups are targeted by the identified effective practices. Although not representative of the national school population in any way, the most common countries of origin served across sites are El Salvador, Mexico, and China.

Overview of Effective Practices

Effective practices for serving immigrant students were examined using data from the site visits and the GAO survey. While the site visits produced a broad array of effective practices, the GAO study identified approaches that were most effective in teaching language acquisition. Respondents to the GAO study ranked transitional bilingual education (teaching academic subjects in both English and the native language until English language skills are acquired) as the most helpful practice. Maintenance bilingual education (teaching academic subjects in both English and the native language with the goal of maintaining and building the native language along with English language skills) was ranked second. Submersion plus ESL, or teaching all subjects in English supplemented with formal English language instruction and teaching academic subjects in English supported by the native language as needed, was ranked third. Submersion, or teaching all subjects only in English was ranked fourth.

Table VI-1

ETHNIC GROUPS BY DISTRICT

District Ethnic Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Cambodia	X														
China						X	X					X	X	X	X
Dominican Republic			X			X							X		
El Salvador			X		X	X	X				X			X	
Guatemala						X							X		
Haiti					X	X									
Honduras			X												
India			X			X									
Japan						X	X								
Korea				X		X									
Laos	X														
Lebanon									X						
Mexico					X	X		X		X	X				
Nicaragua			X			X							X		

Table VI-1

ETHNIC GROUPS BY DISTRICT

District Ethnic Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Philippines												X			
Poland		X													
Portugal					X										
Puerto Rico					X										
Soviet Union				X		X									
Vietnam	X			X		X	X								
Yemen		X							X						
Yugoslavia		X													

Key to Districts:

1. Stockton Unified School District (CA)
2. Hamtramck School District (MI)
3. Jersey City Public Schools (NJ)
4. Federal Way School District (WA)
5. Broward County Public Schools (FL)
6. District of Columbia Public Schools (DC)
7. Montgomery County Public Schools (MD)
8. Nogales Unified School District No. 1 (AZ)
9. Dearborn Public School System (MI)
10. El Paso Public Schools (TX)
11. Donna Independent School District (TX)
12. Hawaii Department of Education (HI)
13. Los Angeles Unified School District (CA)
14. NYC Public Schools, Div. of High Schools (NY)
15. NYC Public Schools, Community SD No. 1 (NY)

Examples of Effective Practices

As mentioned, site-visit data produced a broad array of effective practices. Table VI-2 displays these effective educational practices, by district, for each site visited in the study. An important note to Table VI-2 is that the practices identified for each site are not necessarily the only ones implemented by each district, but are the ones highlighted in each of the case studies. A total of 22 practices have been identified across sites. The most common practices identified are: parent outreach programs (67 percent); staff development (47 percent); bilingual instruction (53 percent); and modified education program (40 percent).

Five key components that appear to have a significant impact on the education of immigrant students emerged from the case studies:

- Administrative Practices;
- Instructional Practices;
- Support Services;
- Dedicated Special Programs; and
- Outreach Programs.

These categories reflect the continuity of practices as well as their broader policy implications across sites, regardless of the differences in the way they are implemented.

Table VI-2

EFFECTIVE PRACTICES BY DISTRICT

Practice / District	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Administrative Strategic Planning					X	X			X				X		
Bilingual Counseling							X								
Bilingual Instruction	X	X						X	X	X		X	X		X
Bilingual Tutorial Program			X		X							X			
Community Outreach Program									X						
Computer Program	X	X								X		X			
Cultural Enrichment Program															X
Dedicated School						X							X		
ESL for Special Education															X
Gang Intervention and Prevention Program	X														
Integrated Mainstreaming		X		X											
Intensive English Language Instruction					X		X			X	X				
Job Training and Placement												X			

Table VI-2

EFFECTIVE PRACTICES BY DISTRICT

District Practice	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Modified Education Program			X				X	X				X	X	X	
Native Language Immersion		X													X
Parent Outreach Program	X			X			X	X	X		X	X	X	X	X
Program Evaluation												X			
Staff Development			X	X	X			X	X					X	X
Structured Support Services				X	X				X						X
Student Identification, Assessment, and/or Tracking			X	X	X	X	X								
Summer Program	X													X	
Whole Language Instruction										X					

Key to Districts:

1. Stockton Unified School District (CA)
2. Hamtramck School District (MI)
3. Jersey City Public Schools (NJ)
4. Federal Way School District (WA)
5. Broward County Public Schools (FL)
6. District of Columbia Public Schools (DC)

10. El Paso Public Schools (TX)
11. Donna Independent School District (TX)
12. Hawaii Department of Education (HI)
13. Los Angeles Unified School District (CA)
14. New York City Public Schools, Division of High Schools (NY)

A. Administrative Practices

A range of administrative practices were described during the site visits, including:

- Student identification, assessment, and/or tracking;
- Modified educational programs;
- Dedicated schools;
- Summer-school programs;
- Staff development;
- Strategic planning; and
- Program evaluation.

Some of these practices were common to several sites; and others were unique to just one. A summary of key components in these administrative practices follows.

1. Student Identification, Assessment, and/or Tracking

Student identification and tracking procedures have been implemented at several sites to monitor student progress, identify and develop interventions for students with academic or other difficulties, and assist with program planning and evaluation. The Transitional Bilingual Program coordinator at one site carefully tracks the academic progress of each immigrant student from registration to graduation, or whenever the student otherwise finishes school. The coordinator monitors student progress reports for academic, social, or emotional problems and by using test scores, grades, and teacher comments determines whether the student is having any problems. If there are problems, the coordinator develops a corrective plan of action that includes referrals to support services and continuous monitoring of the student's progress.

Another site developed a home-language survey that makes it easier to identify the language-minority population. The survey assesses language proficiency and academic skills, and the resulting data are stored in a specially designed database. The database eventually will permit a profile of student strengths and deficiencies by language group as well as indicate intragroup differences according to variables such as length and type of previous schooling.

Several sites have developed structured, multilingual orientation, testing, assessment, and placement services. These structured services provide:

- Multidisciplinary, bilingual staff who serve as the first school contact for immigrant students and their parents;
- Activities to increase multicultural awareness schoolwide;
- Translation services;
- Bilingual diagnostic services for students who are not progressing academically; and
- Testing and assessment staff who assist teachers with planning and teaching lessons for bilingual students.

2. Modified Educational Programs

Several sites recognized that immigrant students have a variety of needs that place them at risk of either dropping out of school, making a poor transition into the school environment, or performing poorly academically. In response, the districts develop highly flexible, individually tailored programs to address the students' academic, social, emotional, and community needs.

Immigrant students often have trouble adjusting to a different school environment. Many did not attend schools in their native country, or arrived in the United States illiterate in their native language. To ease the adjustment into the American educational system, one district developed a program that made learning attractive to the students. This program emphasizes the use of creative forms such as art, drama, and music in teaching English. Specific program components include: English language instruction, improving reading skills, counseling services, and health services.

Flexibility in scheduling and placement is another technique used to accommodate individual differences among immigrant students. At one site, grade level is not established by a student's proficiency in English, but by the student's age-appropriate grade, number of years in the program, and testing scores. Cross-grade language arts and reading classes are arranged in eight different "blocks," which permit longer class periods and more flexible assignments within these periods. All students are mainstreamed for art, music, and sports. Once the student is mainstreamed into content-area classes, class assignment remains individualized and flexible.

Many individual schools identified cooperative learning and the arts as key strategies of all modified programs. Cooperative learning encourages interaction between students, and the arts often bridge the various ethnicities through music, sculpting, and story telling.

3. Dedicated Schools

Two districts developed and/or support the efforts of schools, whose sole purpose is to provide multicultural and/or bilingual education. The schools have defined a philosophy about multicultural learning that includes: (1) a range of services for immigrant and other limited English proficiency students; (2) formal recognition of the special needs of this student population and their families; and (3) recognition and celebration of past and current contributions made by various ethnic groups. Examples include one high school with an unusually large number of languages and cultures. The principal credits the school's philosophy of "honoring the students' languages" for its success. The school not only uses and appreciates the various languages spoken in the school, but also recognizes them as resources to be used in developing a future career. The school also provides non-instructional services (e.g., bilingual counselors, a special dropout prevention program, and vocational education) for immigrants and their families. In addition, students enrolled in an Ambassadors' program serve as ombudsmen for ethnic groups that feel underrepresented in school life.

Another dedicated school, a bilingual elementary school, is based on dual-language immersion in Spanish and English. There are two instructors (one to teach English, and one to teach Spanish) in every class. Because children experience both languages equally and because they learn to speak a language other than their own, there is no "language-minority syndrome." The instructional philosophy is designed to ensure a democracy among the students, instill pride in ethnic and language identity, and emphasizes bilingual learning and mastery.

One district operates two newcomer schools for immigrant students in grades 4-8. After screening for health and psychological needs, the schools determine students' eligibility and contact parents to get permission for their children to attend. The newcomer schools use sheltered English to teach content and provide a teacher and a teaching assistant in almost every class. The schools also employ a full-time bilingual school nurse and psychologist to give immigrant students specialized health care. Group counseling and other support services also are available if teachers deem such services necessary.

4. Summer-School Programs

Two sites highlighted summer-school programs as providing specific opportunities for LEP and immigrant students to advance in school or repeat classes. These sites actively encourage participation in the summer-school program and frequently offer incentives. For example, one district pays for students' bus transportation. Several benefits are inherent in the summer-school programs:

- Students can improve their academic skills;
- Students are offered native language instruction (which may not be available during the regular school year);
- Students become "oriented" to the school environment before the regular school year begins;

- Students can "catch up" with other students; and
- Students are able to spend more time with their teachers.

The programs were seen to be crucial for many students who enter school at junior- or senior-high school levels, having never before attended school.

5. Staff Development

Many districts include a training or professional development component for their teachers and other staff who work with immigrant students. In these districts, such training shows administrative support for maintaining teachers' interest and knowledge in multicultural issues as well as encouraging their professional growth. Training includes in-service sessions and outside conferences and workshops. Examples of the courses offered at one site include "Multicultural Education Training Program," "Valuing Diversity," "Teacher Empowerment for Valuing Diversity," and "Beyond Awareness."

6. Strategic Planning

Districts frequently implement a long-term strategic planning process to develop curriculum or identify gaps in their multicultural education programs. One site conducted a strategic planning process, or "organization and delivery system," as a five-year districtwide plan. One element of the plan ensures that multiculturalism is pervasive in all areas of curricula and not merely a subject matter add-on.

Another site undertook a four-year curriculum development effort to provide competency-based ESL and bilingual maintenance. The resulting program, Language Acquisition and Basic Skills (LABS), operates in eight schools and has become a part of the mainstream program as well. Consistent with the site's whole-family approach to learning, the parents attended special orientation and training sessions about the program. During these sessions, parents asked to be part of the instructional process. In response, the district now offers Saturday sessions for parents.

Through another strategic planning process, one site developed a five-year English as a Second Language (ESL) program that offers students an extra year of high school. Students are able to master English and complete graduation requirements during this fifth year. When the program began in 1985, 90 students participated; in 1991, at one school alone 600 students were enrolled in the program. Teachers have noticed a dramatic reduction in dropout and failure rates for students in this program.

Strategic planning efforts at another site created an office dedicated to multicultural issues. This office provides a centralized service delivery system for foreign-born students, and it offers a wide range of services in one location including: assessment and registration; a transitional bilingual instructional program; development of special programs; and a range of staff specialists, including psychologists, social workers, speech and language pathologists, and resource teachers.

7. Program Evaluation

One district has established an annual process for reviewing its bilingual program's effectiveness in achieving the schools' goals and objectives. The district involves each school's SLEP (students with limited English proficiency) teachers, district resource teachers, principals, and parents in the review. The review examines each school's SLEP program, its identification and assessment procedures, goals and objectives, resources, structure, and location. The district defines evaluation as a quality monitoring process, and a collaborative review, analysis, planning, and implementation process of individual school programs.

B. Instructional Practices

A variety of instructional practices to serve immigrant students are being used in the districts that were visited. These include:

- Bilingual instruction;
- Bilingual tutoring;
- ESL for special education;
- Integrated mainstreaming;
- Intensive English language instruction;
- Native-language immersion; and
- Whole language instruction.

The sites that strongly emphasized one or more of these instructional practices usually developed their programs around a broader philosophy as described below.

1. Bilingual Instruction

Approximately half of the sites viewed bilingual instruction as a teaching method grounded in theory. These theories, or philosophies, varied from site to site, but basically contended that learning should occur in a supportive environment, and that English should be taught within the context of culture and one's own native tongue.

Bilingual instructional methods varied across sites, and included a traditional model, to a modified, or transitional bilingual approach. These modified or transitional bilingual programs presented immigrant students with a slow introduction to English, with mainstreaming as the ultimate objective. In comparison, the traditional model stressed the importance of retaining one's native language while learning a new language. These programs freqently do not emphasize rote learning of grammar and syntax, but focus on a lively interchange between teachers, aides, and students. Field trips to restaurants, parks, museums, or historic sites supplement the English courses and provide a way to put the language into practice in the world outside the classroom.

Even within similar instructional formats, classroom structure and teaching styles may vary. For example, some sites conduct all language classes in English and content classes in the native language. Other teachers team teach in classes with one English speaking teacher, and one native-language speaking teacher. In most cases, the foreign language incorporated into the bilingual program is that of the predominant language spoken by foreign-born students. Examples of languages taught in a bilingual setting across the sites are: Spanish; Vietnamese; Cambodian; Hmong; Arabic; Bengali; and Hawaiian and other Island dialects, such as Ilokano, Samoan, and Tagalog.

2. Bilingual Tutoring

One site without a formal bilingual instructional program offered a bilingual tutoring program to students having academic and other difficulties. The district's multicultural/bilingual staff conducts the after-school tutoring program, which is very popular among immigrant students. The program offers support in languages such as Gujarati, Haitian/Creole, Korean, Spanish, and Vietnamese. A teacher must refer students to the program, and students must have parental approval before they can participate. The program offers students a less intimidating learning environment and increases their ability to succeed in the regular school environment.

3. ESL for Special Education

In one district, limited-English-proficient students in monolingual special education classes are provided with ESL instruction. Special education teachers, who are trained in ESL strategies by a teacher specialist, deliver the instruction, which focuses on developing English language skills. The project serves 144 LEP students enrolled at seven elementary schools and four junior high schools.

4. Integrated Mainstreaming

Two sites use an integrated mainstreaming approach that combines instruction both in mainstream and bilingual classes. While mainstreaming a student is the primary objective, bilingual support addresses a student's language needs during this transition. One site operates a newcomer center for newly arrived non-English speaking students, which provides basic interpersonal communication skills to prepare immigrant students academically and socially for mainstream classes.

5. Intensive English Language Instruction

At least four sites combine intensive English language instruction with other types of instruction. These districts implemented a transitional bilingual program and incorporated an accelerated English language training course into the broader curriculum. This instructional method is individualized for each student. One site has implemented a "school within a school" to help students acquire English skills quickly. The intensive English-language instruction emphasizes developing language skills, while content classes are conducted in the students' native languages.

6. Native-Language Immersion

Two sites designed native-language immersion programs so students speak their native language to learn content curricula and reasoning abilities. A positive result of this strategy is a districtwide focus on culture, which reinforces taking pride in one's cultural heritage.

7. Whole Language Instruction

A whole "language experience" approach (as proposed by Roach Van Allen) is based on the concept that human beings learn a language not only through sound and the sight of words, but by using the whole body. One site utilizes this strategy to teach English words by using art activities, such as painting, coloring, and working with play-dough.

C. Support Services

Several sites provided support services for their LEP students that ranged from miscellaneous services to structured bilingual counseling.

Bilingual counseling provides immigrant and other LEP students with a variety of support services delivered by specialized bilingual staff. Counseling services varied across sites, but frequently included determining special services for students; advocating for students experiencing conflict; advocating cross-cultural perspectives; providing support and establishing communication with parents; and providing in-service training and workshops for school staff. In all sites, the services always targeted the special needs of the immigrant and other LEP students, as compared to the regular school counselor who concentrated mostly on scheduling issues.

A range of other support services also was examined across the sites. These services were important because of their content and their ongoing availability and accessibility to immigrant students. Many of the services--such as clothing banks, translation and interpretation services, and the availability of specialized staff--provide help for entire families. Other services were more specific to the support of students' academic needs, such as language banks, book mobiles, resource centers, and supplementary arts programs.

D. Dedicated Special Programs

Of the sites visited, four categories of special programs were observed as key components of the immigrant or bilingual programs:

- Cultural enrichment;
- Computer-assisted instruction;
- Job training and placement; and
- Gang intervention and prevention.

1. Cultural Enrichment

Most study sites implemented some form of a cultural enrichment program such as multicultural staff training and workshops, multicultural school newsletters, or schoolwide festivals and cultural events. At one site, however, a program had been developed specifically to enhance multicultural learning at a school where 95 percent of the students are language minorities. The program has a thematic/interdisciplinary approach, using art, folk tales, performing arts, instrumental music, and storytelling to enhance the multicultural curriculum, and to familiarize students with other ethnic groups.

2. Computer Program

Many sites offered computer programs targeted to different ethnic populations and provided students (and sometimes parents) with an individualized learning tool. Technological skills obtained in the programs often could be transferred to the workplace.

The diversity of the programs is illustrated in the following examples. One site developed a take-home computer program that benefits whole families. The school lends a computer for six weeks to a family whose primary language is Spanish, Hmong, or Laotian. Different software packages are used to teach phonics, spelling, and vocabulary to the students and their families. One of the software packages includes an electronic mail system that enables members of the family to leave messages for one another. Families are provided several hours of training before taking the computers home. The program's intent is not to teach English in a six-week crash course, but to supplement ongoing English-language development and generate family interest in learning English.

Another site piloted a Computer-Assisted Math Program (CAMP), based on a bilingual Arabic-English math model for first- and second-graders. The program supplemented regular classroom instruction in math. It proved so successful that it has been incorporated into the regular curriculum. In addition, the number of computers has expanded from three to 25, and computer-assisted language arts modules have been added.

One district used IBM's Writing to Read (WTR) software to increase the reading and writing performance of students in kindergarten and first grade. The district has observed many benefits of the program, including high student interest, improved school attendance, and individualized instruction for students who may proceed at their own pace.

A peer tutoring and computer program, developed at another site, improved students' language thinking skills and reduced the cost of bilingual education programs. This project targets Asian and Pacific-Island LEP students and is available at the elementary, intermediate, and high school levels.

3. Job Training and Placement

A job-training component was highlighted at one site. Instructional activities include guest speakers from the business community, films, field trips, role playing, and discussions about work readiness. A job-placement coordinator administers the program and provides career counseling, job referral, and job placement. The program is especially responsive to immigrant and refugee students who are from low-income families and are unemployed or underemployed. For these students, meaningful work is essential both to their survival and to an improved self-image.

4. Gang Intervention and Prevention

One district sponsored a gang and drug intervention and prevention program aimed at fighting the increasing gang problem in the area. Immigrants are particularly susceptible to joining youth gangs; as one Cambodian mother puts it: "Boys are just left on their own, to fend for themselves. Many parents are negligent and depressed due to overcrowded apartments and gambling problems." In addition, one of the program's gang specialists pointed out that immigrants are vulnerable to gang membership because they need to be around others who speak the same language: they band together for communication purposes as well as protection. The program's primary focus is on Hispanic males and combines community and parental involvement as an intervention strategy for these at-risk students.

E. Outreach Programs

Two core outreach programs were observed at many sites: programs for family outreach and community outreach. Their significance was expressed well at one site, which emphasizes "family and community involvement" as being more than a series of practices: it is a metaphor for the way the schools operate at every level. Community involvement often includes adult education programs, meetings with the non-english speaking community, and neighborhood outreach programs.

Many sites maintain open communications and respect for the families' cultural differences and or preferences. One district established a program that fosters mutual trust and enhances students' emotional, social, and academic success in school. A specific outreach program at one district elementary school holds social informational meetings with families (and interpreters) three times a year. Each meeting has a formal two-hour agenda that includes gift certificates from local merchants used as door prizes to encourage family attendance.

Several special services and programs for families of immigrant students are conducted at another site. Each school has a parent activity council as part of the Parent-Teacher Council (the local equivalent of PTA). Teachers are released, at least twice a year, to provide an in-school day for families to meet teachers, go over report cards, and learn about school activities. In some schools, families also attend classes with their children. At other sites, regularly scheduled meetings provide families with information about social service agencies, parenting skills, health-related issues, homework procedures, and immigration policies.

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VII. SUMMARY AND CONCLUSIONS

VII. SUMMARY AND CONCLUSIONS

The preceding sections have presented a wide variety of data about the Immigrant and Refugee Programs. These data can be used to draw at least 12 general conclusions about the two programs and to identify at least four important policy questions to be considered by the U.S. Department of Education.

A. Conclusions about the Programs

1. The number of eligible immigrant students in the U.S. has been rapidly increasing. In 1989 there were an estimated 700.000 immigrant students eligible for the Immigrant Program. Approximately 564.000 (85 percent) were in 529 school districts that received EIEA funding. The remaining 15 percent of eligible students were in districts that (1) did not meet the Immigrant Program's minimum size of 500 students or 3 percent of the total student population. or (2) chose not to apply for funding. In 1990. the number of eligible immigrant students in districts receiving EIEA funding increased 6.8 percent to 602.178. In 1991. the number of eligible students increased 14.1 percent to 687.334. The number of eligible immigrant students actually receiving services is reported in biennial reports to Congress.

2. The Refugee Program served a much smaller number of eligible students than did the Immigrant Program. In the 1989-90 school year--the final year of operation--there were approximately 74.229 refugee students in 410 school districts that received TPRC funding. Congress appropriated $15.808.000 for the program that year. and the per-student grant amount was approximately $213. The number of eligible refugee students actually receiving services is not known because SEAs did not report the number to OBEMLA.

3. The school districts receiving funding under one program often did not receive funding under the other program. To be eligible for TPRC funding, a district had to have a minimum of 20 eligible refugee students. Because of the difference in eligibility requirements and minimum size between the programs, there were 270 school districts in 1989 that received funding from the Refugee Program but not the Immigrant Program. There were 398 districts that received funding from the Immigrant Program only. There were 140 school districts that received funding under both the Refugee and Immigrant Programs. In 1990--the year following the end of the Refugee Program--only 27 districts that received funding only under the Refugee Program in 1989 qualified for funding under the Immigrant Program. It is important to note that while all refugee students are also immigrants, only a small percentage of immigrant students are refugees.

4. Although Congress appropriated approximately $30 million per year for the Immigrant Program, the increasing number of eligible students has reduced the per-student grant amount each year. In 1989, the per student grant amount was approximately $62; in 1990 it fell to approximately $50; and in 1991, it fell again to approximately $43. School districts with a stable enrollment of immigrant students have experienced a loss of funds for serving those students. Districts with an increasing immigrant student enrollment have been experiencing steady or increasing funding but for a much larger number of students.

5. Districts and states vary in the procedures used for counting students in both programs, with consequent variation in the quality of the data collected. However, the total number of immigrant students served by the Immigrant Program is probably less than the total number of eligible immigrant students nationwide because of the minimum size threshold for the program.

6. Both the Immigrant and Refugee Programs are striking in their diversity of students. Although refugees come from a very small number of countries (eleven eligible countries in 1989), immigrant students come from more than 160 countries. Some arrive with strong education backgrounds, while others arrive having had little formal education. Some have strong English language skills; others are not even literate in their native language. Some have arrived through peaceful transition, and their families are intact; others have had long tragic journeys and are separated from their relatives. It is very difficult to make generalized statements about these students or draw conclusions for the overall immigrant student or refugee student populations. Immigrants from different parts of the world have very different experiences and needs. It is a challenge for the school district to try to meet the diversity of those needs. Districts often are confronted with far more language groups than they can support even with bilingual aides. The numbers of students from any one country or language group are often too small to warrant a separate class, so students from several countries are placed together in classes. Large districts often have the necessary additional resources and numbers to have successful bilingual programs.

7. LEAs do not operate distinct programs for only refugee or immigrant students; instead, these students are included in the districts' larger programs for LEP students. The immigration status of refugee and immigrant students is important for purposes of collecting funds and for tracking services to those students. The designation as a refugee or immigrant, however, tends to disappear once students have been counted in the census and funds received. Thereafter, the students tend to be treated as part of the district's bilingual or ESL program and taught along with other LEP students. Consequently, the materials purchased, aides hired, etc., are used for all students in the LEP class, not just immigrants or refugees. Thus, the program regulations governing Title VII, Chapter I, or State funding for LEP students more strongly affect the education students receive.

8. Refugee and immigrant students have strong linguistic needs and strong acculturation needs. The LEAs tend to serve the linguistic needs through formal ESL programs while serving acculturation needs through counseling and other support services. ESL teachers will instruct students in English and other subjects during the regular school day and summer school. Counselors and ESL teachers deal with the students' physical, emotional, and cultural needs through daytime sessions, after-school programs, and evening meetings with parents and the community. The academic and support needs of immigrant and refugee students still exceed the LEAs' capacity to meet those needs. LEAs have established language training as the most critical need and have allocated resources accordingly. However, the other needs of the students (and parents) are not being met with existing resources.

9. LEAs used the funding from either program to purchase resources on a one-time and marginal basis. Districts do not consider program funding, at an average of $43 per immigrant student or $213 per refugee student for the year, to be either reliable or consistent in grant amount. Because of the flexibility in the use of funds, they are used to purchase items not allowable under other programs, such as Title VII and Chapter 1. They also are used to make one-time purchases such as textbooks, pay for field trips, or hire temporary classroom aides. At $43 per immigrant student or $213 per refugee student for the year, the funds are not sufficient to support regular instructional personnel except in very large districts. Even in districts with large immigrant and or refugee student populations, the uncertainty of the program from year to year and the inability to offer permanent employment makes it difficult to hire the best people.

10. The two programs are administered in very similar ways, and the funds are used for similar kinds of purchases. Districts use the funds to purchase textbooks, supplemental materials, to pay teacher aides, and for transportation.

Few districts used the program funds to construct facilities, although some districts used either Immigrant or Refugee Program funds to rent additional classroom space. Many school districts had the same personnel administer both programs.

11. In the Immigrant program, although LEAs conduct their count of eligible students in March, they are not given formal notification of whether and how much their grant amount will be until November. LEAs find budgeting difficult because they are uncertain whether the program will be funded each year and whether funds will be adequate. In addition, grant payments often arrive after the start of the school year. The annual student count is conducted in March and submitted to the SEA by April. The SEA applications are submitted to OBEMLA in May, and SEAs are notified of their grant awards between June and September. SEAs then send the subgrant application materials to LEAs in September, and the LEAs submit their formal request for grants and their plans in October. The SEA reviews the plans and finally notifies the LEA in November of the amount of its grant. Thus, LEAs do not start planning for the use of the funds until receiving written notification well into the school year. Most districts do activity and curriculum planning in late spring for the following academic year.

12. The teachers and administrators serving immigrant and refugee students have been both creative and resourceful in operating the two programs. LEA staff have been successful in using Immigrant and/or Refugee Program funds in concert with funding from other Federal and State programs to provide a broad array of instructional and support services for eligible students. Instructional services range from native language immersion to integrated mainstreaming to cultural enrichment programs. Support services range from parent outreach to job placement to bilingual counseling. LEAs have also modified their administrative practices to include dedicated multicultural schools, strategic planning, and administrative offices dedicated to multicultural programs. LEA staff have

planned their programs for serving immigrant and refugee students and then found ways to draw from EIEA, TPRC, Title VII, Chapter I, and other funding sources to make the programs a reality. And when Federal, State, or local funding was not available, staff reached into their own pockets to pay for the necessary expenses.

B. Implications from Projections of Future Trends in Immigration

Recent events suggest that the problem of serving immigrant and refugee students in the future will become larger and more challenging. Immigration patterns in the United States in the last two decades have been shaped by the Immigration and Naturalization Act of 1965, a series of refugee acts passed during the 1960s through the 1980s, and foreign and domestic economic and political factors (NCAS, 1988). The Immigration Reform and Control Act of 1986, and its 1990 amendments, represent the first significant changes to immigration laws and policies since 1965. The amendments retained the exemptions from numerical limitations for "immediate-relatives," but expanded the numerically limited category to include new countries of origin ("diversity" immigrants), and employment-based immigrants. The act emphasizes the need for more highly skilled immigrants and includes visas for "entrepreneurs willing to invest at least $1 million in the United States and to create 10 new jobs ($500,000 if the investment is in a rural area)" (Lochhead, 1990). Additional visas have been earmarked for "people from Italy, Poland, Ireland, and other traditional immigrant sources that have been virtually shut out for the past 20 years" (Seattle Times, December 1991). In summary, the amendments:

- Relax political restrictions;
- Instruct the Health and Human Services Secretary to remove AIDs and other diseases from the medical list for which a person may be denied entry;

- Boost immigration from Hong Kong to 10,000 a year and to 27,000 each year after 1994; and
- Grant effective amnesty to an estimated 30,000 Irish immigrants living illegally in the United States.

Several projections about immigration levels and their impact in the upcoming years have been made, but most were made prior to the 1990 amendments. For example, Passel offers projections based on U.S. levels of fertility, mortality, and net immigration (the difference between immigration and emigration) scenarios. Using a conservative estimate of annual net immigration of 250,000 (lower than current legal immigration), Passel projects that immigration would still account for 30 percent of the population growth in this country in the next 45 years (Passel, 1986). When considering that most experts predict net immigration will increase from current levels (United States General Accounting Office, 1988; U.S. Department of Labor, 1989; Passel, 1986) and that undocumented immigration levels are not even included in these predictions, the impact of immigration on population growth in this country appears significant.

Also not included in these predictions is the possible influx of immigrants from the now-disbanded Soviet Union as a result of continuing economic crises in combination with the emerging Commonwealth of Independent States. Estimates of numbers involved in such a migration are high, and "West European specialists on migration estimate that 7 million will exodus from the Soviet Union" (Ghosh, in Aron, 1991). This potential exodus has in fact already begun, as "some 600,000 Soviet citizens have obtained immigration forms from the U.S. Embassy in Moscow since October 1989" (Aron, 1991).

These factors, combined with the recent expansion of some eligibility categories under the 1990 Immigration Act, seem to indicate that future immigration waves will continue to have profound effects on America's labor force, social services, communities, and schools. Consequently, the Federal government must decide what role it will play in assisting school districts in meeting the needs of newly arriving students.

C. Federal Policy Options

There are at least four policy options for the U.S. Department of Education to consider in the further planning for the Immigrant and Refugee Programs.

> Option 1. Because immigrant and refugee students usually are served as part of a district's LEP population, the Department should consolidate the programs with another, larger Federal program (e.g., Title VII) to reduce administrative costs.

Arguments in favor. Immigrant and refugee students clearly are treated separately from other LEP students for purposes of the annual student count for each of the two programs. However, once the students enter the classroom, refugees and immigrant students are provided the same instructional services as other LEP students. Teachers and program administrators do not think it is necessary or desirable to focus attention on the student's immigration status. Rather, they focus attention on the cultural background of all LEP students to reinforce the multicultural reality of the world that all students (including U.S. citizens) will be facing. Program coordinators and other district staff administer the two programs in a very similar fashion in the way the student counts are conducted, making similar kinds of purchases of instructional materials or classroom aides, and student assessment.

Arguments against. While the administration of the Immigrant and Refugee Programs are similar--and similar to other ESL programs for LEP students--the existence of discrete programs serves an important function. By being separate, the Immigrant and Refugee Programs formally recognize the needs of a growing group of students. Immigrant and refugee students have additional education and support needs than do other LEP students because of the recency of their arrival, lack of exposure to formal education, the emotional trauma of escape or family separation, the lack of preparation for immersion in a foreign culture, and the lack of an established support network outside the school. The investment of additional resources to help a refugee or immigrant students when he or she first arrives may deter the student from gang or other undesirable behavior later which will cost the public even more to correct.

Furthermore, the establishment of separate programs for immigrant and/or refugee students is an important way of publicly acknowledging the unusual set of circumstances and needs that these students have. This recognition gives local LEP/ESL program staff the credibility for requesting yet other State and local resources for serving these students.

Option 2. Change the definition of eligible immigrant or refugee students to recognize the number of years it actually takes these students to become language proficient and acculturated.

Arguments in favor. The current eligibility definition allows immigrant and refugee students to be served in the program only if they have been in the U.S. three years (two years for an elementary refugee student) or less. The length of time in the country is a much simpler criterion to administer and avoids the potential controversy regarding which tests shall be used to measure proficiency and at what grade levels.

Arguments against. LEAs report that it often takes six or seven years for an immigrant student to learn enough English to be mainstreamed and become adjusted to American culture. Severe emotional problems or educational deficiencies cannot be corrected in just three years, yet after three years the students are no longer eligible for services. Once the student passes the three-year mark, he or she is still in the LEP program but no longer has additional resources supporting him or her. The sudden loss of support can have an adverse effect on the student's academic progress and may lead to behavior problems.

Option 3. Continue to distribute program funds on a formula basis rather than shift to discretionary funding.

Arguments in favor. Discretionary funding for both programs has important implications for which school districts would receive funding. If school districts were to apply for Immigrant or Refugee Program funding the same way they apply for Title VII grants, then those districts with experienced grant writers and established reputations would be most likely to receive funding. For example, one of the 15 LEAs visited as part of this study had applied for Title VII funding for three consecutive years. In spite of having what appears to be a very effective program for serving immigrant students, they have been turned down for Title VII funding all three years. Awarding Immigrant Program grants on a competitive application basis may have resulted in this district's having received no funding and in turn having to cut critical instructional and support services to its immigrant students.

Arguments against. Congressional funding has been relatively constant for the last three fiscal years while the number of eligible students has increased. The net effect of this has been to reduce the per-pupil grant amount from approximately \$62 in FY1989 to \$50 in FY1990 and to \$43 in FY1991. At some point the U.S. Department of Education must determine the minimum per-pupil grant necessary to continue an effective program (such a calculation was outside the scope of this evaluation). If program funding does not allow the minimum threshold funding for all eligible districts, funding should be awarded to those districts presenting the best ideas and plans for serving immigrant students.

Option 4. Require greater accountability by SEAs for reporting outcome measures of achievement and performance for immigrant and refugee students being served under these programs.

Arguments in favor. The SEA and LEA respondents interviewed and surveyed for this evaluation believed that both programs had a significant impact on the education of immigrant and refugee students. Outcome measures of achievement and performance for those students, however, were not readily available at the LEA, SEA, or Federal levels. The current Immigrant Program requires States to report only on two process indicators: country of origin and grant expenditures by category.

There is some evidence that LEAs do evaluate LEP students' academic progress on standardized tests and regular classroom exams, but there has been little systematic analysis of these measures for immigrant students as a distinct group at any level. Thus, the effectiveness of both programs for improving academic performance cannot be determined at this time. OBEMLA has the authority to establish its own format for the annual performance report required under existing administrative regulations and can notify SEAs of that format.

Arguments against. Immigrant students receive only a small proportion of their instruction through services funded by the two programs. The large number of intervening factors and the absence of standardized testing across SEAs and LEAs means that additional efforts by SEAs would not yield more conclusive outcome data. The anecdotal evidence available is sufficient to show the programs have important support service outcomes for students even though these data are not reported in any systematic way.

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Appendix A

APPLICATION, REPORTING AND MONITORING FORMS

APPLICATION FOR FEDERAL ASSISTANCE FORM

OMB Approval No. 0348-0043

APPLICATION FOR FEDERAL ASSISTANCE

2. DATE SUBMITTED

Applicant Identifier

1. TYPE OF SUBMISSION:

Application
☐ Construction
☒ Non-Construction

Preapplication
☐ Construction
☐ Non-Construction

3. DATE RECEIVED BY STATE

State Application Identifier

4. DATE RECEIVED BY FEDERAL AGENCY

Federal Identifier

5. APPLICANT INFORMATION

Legal Name:

Organizational Unit:

Address (give city, county, state, and zip code):

Name and telephone number of the person to be contacted on matters involving this application (give area code)

6. EMPLOYER IDENTIFICATION NUMBER (EIN): ☐☐ — ☐☐☐☐☐☐☐

7. TYPE OF APPLICANT: (enter appropriate letter in box) A

A. State	H. Independent School Dist.
B. County	I. State Controlled Institution of Higher Learning
C. Municipal	J. Private University
D. Township	K. Indian Tribe
E. Interstate	L. Individual
F. Intermunicipal	M. Profit Organization
G. Special District	N. Other (Specify):

8. TYPE OF APPLICATION:

☐ New ☐ Continuation ☐ Revision

If Revision, enter appropriate letter(s) in box(es): ☐ ☐

A. Increase Award B. Decrease Award C. Increase Duration
D. Decrease Duration Other (specify):

9. NAME OF FEDERAL AGENCY:
U. S. Department of Education

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 8 4 - 1 6 2

TITLE: Emergency Immigrant Education

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:

12. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.):

13. PROPOSED PROJECT:

Start Date
Ending Date

14. CONGRESSIONAL DISTRICTS OF:

a. Applicant
b. Project

15. ESTIMATED FUNDING:

a. Federal	$ .00
b. Applicant	$ .00
c. State	$ .00
d. Local	$ .00
e. Other	$ .00
f. Program Income	$ .00
g. TOTAL	$

16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?

a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON:

DATE ____________

b. NO. ☐ PROGRAM IS NOT COVERED BY E.O. 12372

☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?

☐ Yes If "Yes," attach an explanation. ☒ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Typed Name of Authorized Representative

b. Title
Commissioner of Education

c. Telephone number

d. Signature of Authorized Representative

e. Date Signed

BEST COPY AVAILABLE

STUDENT REPORT FORM

U. S. DEPARTMENT OF EDUCATION
Office of Bilingual Education and Minority Language Affairs

TRANSITION PROGRAM FOR REFUGEE CHILDREN
FY 1988

Student Report Form

District ______________________ State ____________

	Refugee Children Enrolled
Elementary schools	________
Secondary schools	________
Total	________

Department of Education Form No. 443-2

OMB No. 1885-0503
Expiration:

LEA APPLICATION FORM USED BY CALIFORNIA

California Department of Education
Bilingual Education Office

DUE DATE: APRIL 12, 1991

EMERGENCY IMMIGRANT EDUCATION PROGRAM

FY 1991-92 APPLICATION FOR FUNDING

CDE 100

Return to: California Department of Education
Bilingual Education Office
P.O. Box 944272
Sacramento, CA 94244-2720

Attention:
(916) 323-7855

RECEIVED
MAY 1 1991
Bilingual Education
Office

PLEASE NOTE: All school districts are urged to complete the immigrant student count. CDE needs this information to make recommendations that may lead to getting financial assistance to districts with immigrant students but who are not eligible under current criteria.

County Code				District Code				
1	9	6	4	5	2	7		

PART I

School district:

Address:

City

ZIP

PART II -- All districts are urged to complete this section and submit it promptly.

	Number of Immigrant Pupils Enrolled													
	K	1	2	3	4	5	6	7	8	9	10	11	12	Totals
A. Public school	63	78	63	53	45	46	16	29	27	60	80	61	45	666
B. Nonpublic	----	----	----	----	----	----	----	----	----	----	----	----	----	----
C. Totals	63	78	63	53	45	46	16	29	27	60	80	61	45	666

D. District and immigrant student count relationships

Total district enrollment is 10,655.00

All districts are urged to complete Part II. Information will be used to try to get financial assistance to noneligible districts with immigrant students.

Immigrant count is 6 % of district's enrollment.

PART III

A. Is the immigrant student count 500 or at least 3% of the total enrollment? ☒ Yes ☐ No

B. If "A" was answered "yes," does the school district wish to apply? ☒ Yes ☐ No

C. Application must include the List of Eligible Students by Number and National Origin.

D. All school districts are urged to complete and submit this form to the above address by April 12, 1991.

PART IV -- Estimating Subgrant Awards for Eligible Districts

Since the Emergency Immigrant Education Assistance Program is an entitlement program based upon student counts, district personnel can estimate a school district's projected subgrant by multiplying the immigrant student count by $50 (this figure is also an estimate).

(Immigrant count x $50) = $33,300.00

This amount is only an approximation and you will be formally notified about the specific amount at a later time. With this information, however, your staff should be able to make tentative program plans.

Applicant (School district)	Contact person	Telephone

CERTIFICATION: I hereby certify that all applicable state and federal rules and regulations will be observed; that to the best of my knowledge, the information contained in this application is correct and complete; and that the attached assurances are accepted as the basic conditions in the operations of this project/program for local participation and assistance.

Signature of authorized agent	Title	Date
	Coordinator-	

BEST COPY AVAILABLE

LEA APPLICATION FORM USED BY TENNESSEE

EMERGENCY IMMIGRANT EDUCATION PROGRAM

STUDENT REPORT FORM

MARCH 1991

This form must be completed in order to receive funding under the Emergency Immigrant Education Program (20 U.S.C. 3121-3130).

1. Number of eligible immigrant children enrolled in Public and Nonpublic Schools.

	Public School Immigrant Children Enrolled	Nonpublic School Immigrant Children Enrolled
Elementary Schools (K-6)	258	55
Secondary Schools (7-12)	227	35
Total	485	90

2. Method(s) used to determine eligibility.

   a. Public School System Eligibility of students was determined by a review of immigration records, informal interview (student/parent/guardian), review of school records, information from the local resettlement agencies.

   b. Nonpublic Schools Eligibility was determined by a review of students' school records, reports from schools' admissions office and Social Service Department review of court records, information received from liaison from resettlement program.

3. Identify the location of the master listing of "eligible immigrant children." Location of the master listing of "elibile immigrant children" is the Bilingual Office, Room 252, 2597 Avery, Memphis, TN 38112.

ASSURANCES

1. The count of eligible immigrant children meets the criteria for "Immigrant Children" as established in Public Law 100-297- April 28, 1988, Part D, Section 4402.

2. The count reflects the number of immigrant children enrolled in public and nonpublic schools within the school system's jurisdiction.

Superintendent/Director of Schools

April 3, 1991
Date

MONITORING REVIEW

NEW MEXICO STATE DEPARTMENT OF EDUCATION

EMERGENCY IMMIGRANT EDUCATION PROGRAM
PUBLIC LAW 98-511

PROGRESS REPORT

DISTRICT Public Schools

DATE March 14, 1990

NO. OF PARTICIPATING STUDENTS 149 students

PERSON(s) CONTACTED Director of Special Services

REVIEWER

STUDENT IDENTIFICATION PROCESS: Enrollment forms.

* * *

FUNDED OBJECTIVES	**HOW STUDENTS ARE BENEFITTING FROM PROGRAM**
1) Bilingual Education and/or ESL teachers at Columbus Elementary, Martin Elementary, Deming Junior High, and Deming High School will purchase and utilize bilingual instructional component and services to bilingual education students.	1) During the interview with Dr. it was ascertained that their objective has been carried out. Materials have been purchased and are being used by teachers as observed by this writer during a classroom observation. These and other materials to be purchased are appropriate for meeting the needs of project students in the context of this program. All purchases of materials have been carefully recorded. Director of Special Services maintains files of POs listing all materials ordered.
2) Participating teachers and instructional assistants will receive inservice training in bilingual education methodology, teaching reading to bilingual students, ESL instruction, and other bilingual education related activities.	2) Training for teachers and participating instructional assistants has been provided through the NMSU Region 19 Resource Center in El Paso, Texas, in the areas addressed by this objective. Dr. , Title VII Director at the Gadsden Independent Schools, and , Principal of Martin Elementary School, have also conducted inservice training for participating staff.

CHILD COUNT REPORT FORM

U.S. DEPARTMENT OF EDUCATION

OFFICE OF BILINGUAL EDUCATION AND MINORITY LANGUAGE AFFAIRS

Emergency Immigrant Education Program

PART III

INSTRUCTION

The CHILD COUNT REPORT form is for the SEA to report the number of eligible immigrant children enrolled in the State's eligible LEAs. This reporting form has two sections. Section A is for those SEAs that are applying for funding under the Emergency Immigrant Education Program (EIEP) but are NOT applying for the Transition Program for Refugee Children (TPRC), and do not need Federal assistance in the calculation of their subgrants. If an SEA needs Federal assistance in calculating its subgrants, the SEA should use Section B. For the SEAs applying for both the EIEP and TPRC, must use Section B form.

Section A:

State total ____________________

Appendix B

SCHOOL DISTRICTS REPORTING EIEA OR TPRC ELIGIBLE STUDENTS
1989-91

SCHOOL DISTRICTS REPORTING EIEA OR TPRC ELIGIBLE STUDENTS 1989-1991

Subgrantee	Refugee Students 1989-90	Immig. Students 1989-90	Immig. Students 1990-91	Immig. Students 1991-92
ALABAMA				
Huntsville City Schl	29	0	0	0
Mobile County Schls	39	0	0	0
** Subtotal **	68	0	0	0
ARIZONA				
Bicentennial HS #76	0	0	0	14
Crane Elem. Dist. 3	0	211	246	280
Creighton Elem. Dist.	37	307	447	542
Douglas USD #27	0	380	447	495
Dysart USD #89	0	139	143	239
Fowler Elem. SD #45	0	50	0	0
Gadsden Elem. SD #32	0	220	163	234
Glendale Union High	42	0	0	0
Hyder Elem. SD #16	0	56	59	63
Isaac Elem. SD #5	0	394	532	626
Kyrene Elem. Dist.28	21	295	0	0
Littleton Elem. SD	0	50	78	64
Mesa Unified Dist. 4	26	563	579	644
Mohawk Valley Elem.	0	20	22	24
Murphy Elem SD #21	0	424	349	356
Nogales USD #1	0	810	1310	1196
Osborn Elem. Dist. 8	48	167	154	241
Phoenix Elem SD #1	0	989	926	1140
Phoenix Union High	24	556	764	821
Santa Cruz Elem. #28	0	0	15	27
Santa Cruz Valley HS	0	0	0	29
Scottsdale Unified	24	0	0	0
Somerton Elem SD #11	0	450	512	527
Sunnyside USD #12	0	0	652	710
Tempe Elem. Dist. 3	75	0	469	891
Tempe Union High 213	23	0	0	0
Tolleson Elem. #17	0	0	113	80
Tucson Unified Dis.1	31	2233	2318	2833
Washington Elem. Dis	129	0	0	0
Wellton Elem. #24	0	0	0	34
Wilson Elem SD #7	0	130	211	235
Young Elem SD #5	0	5	0	0
Yuma Elem SD #1	0	397	519	855
Yuma Union High	0	322	442	452
** Subtotal **	480	9168	11470	13652

ARKANSAS				
Fort Smith Pub. Schl	99	0	0	0
Jonesboro	2	0	0	0
Little Rock	35	0	0	0
** Subtotal **	136	0	0	0
CALIFORNIA				
ABC USD	0	2185	2070	1611
Alameda USD	1463	0	447	854
Alexander Valley Un	0	19	26	19
Alhambra City Elem.	0	1691	1629	2055
Alhambra City High	0	1075	1273	1873
Alisal Union Elem.	0	422	509	535
Alum Rock Union Elem	0	1309	3220	2812
Alview-Dairyland Un.	0	0	14	13
Anaheim City Elem.	0	1623	1827	2823
Anaheim Union High	0	1328	2647	3230
Antelope Val. U. HSD	0	0	0	333
Antioch Unified	7	0	0	0
Arcadia USD	0	833	955	1041
Arvin Union	4	284	303	345
Atwater Elem. SD	0	0	148	195
Azusa USD	0	571	963	1308
Bakersfield City El.	0	821	1004	984
Baldwin Park USD	0	1376	1505	1506
Ballard SD	0	0	2	0
Ballico-Cressey SD	0	20	27	37
Banning USD	0	544	214	255
Bassette USD	0	564	507	699
Bellflower Unified	4	393	500	530
Berkeley USD	0	488	512	458
Berryessa Union Elem	0	788	1360	1758
Beverly Hills USD	0	354	390	403
Bishop Jt. Un. High	0	0	0	23
Bishop Union El. SD	0	0	0	59
Bonsall Union Elem.	0	52	185	209
Borrego Spring USD	0	67	41	53
Brawley Elem.	0	222	271	272
Brawley Union High	0	87	96	123
Browns Elem SD	0	0	12	0
Burbank USD	0	761	957	1184
Burrel Union El. SD	0	0	0	43
Butte	191	0	0	0
Calexico USD	0	728	706	685
Calipatria USD	0	73	68	87
Calistoga Jt. USD	0	0	42	56
Campbell Union Elem.	0	254	443	426
Campbell Union High	0	514	327	423
Capistrano USD	0	834	1343	1142
Cardiff Elem.	0	27	39	63
Carlsbad USD	0	355	349	430

Carpinteria SD	0	154	238	218
Caruthers Un. High	0	0	25	17
Castaic Union SD	0	64	49	68
Centinela Valley UHS	0	466	501	711
Central Union High	0	205	205	264
Centralia Elem.	0	362	417	386
Ceres USD	0	0	210	320
Chaffey Jt. Union HS	0	0	0	624
Charter Oak USD	0	429	334	225
Chico USD	0	0	381	0
Chualar Elem.	0	50	42	37
Chula Vista Elem. SD	0	0	0	1010
Coachella Valley USD	0	1089	1347	1462
Coalinga-Hurton USD	0	0	342	0
Colusa USD	0	0	175	191
Compton USD	0	3651	3687	4664
Contra Costa	369	0	0	0
Corning Union High	0	0	0	26
Corona-Norco USD	0	521	685	682
Cotati Rohnert Park	6	0	0	0
Covina-Valley USD	0	416	561	682
Cucamonga SD	0	0	0	210
Culver City USD	1	155	0	187
Cupertino Union Elem.	0	716	1102	999
Cutler-Orosi USD	0	0	331	279
Del Norte Co. Uninf.	15	0	0	0
Del Paso Heights Elem.	0	55	72	0
Delano Jt. Un. High	0	0	477	542
Delano Union Elem.	0	402	409	436
Delta View Jt. Un.	0	0	4	4
Desert Sands USD	0	802	1153	1312
Dinuba Elem. SD	0	0	174	0
Dinuba Jt. Un. High	0	0	35	0
Dixon USD	0	224	261	284
Dos Palos Jt. Un. Elem.	0	0	58	96
Duarte USD	0	242	264	320
Earlimart Elem.	0	82	100	0
East Side Union High	0	1463	2063	1602
Eastside Union SD	0	40	46	52
El Centro Elem.	0	471	563	641
El Monte City Elem.	0	822	861	1562
El Monte Union High	0	620	880	1215
El Rancho USD	0	384	574	0
Empire Union SD	0	0	0	107
Encinitas Union Elem.	0	285	319	367
Escalon USD	0	104	93	144
Escondido Un. High	0	0	294	414
Escondido Union Elem.	0	764	1199	1487
Eureka City Elem. SD	0	0	0	92
Evergreen Elem.	0	606	509	525
Fairfield-Suisun USD	0	0	0	521
Fallbrook Union Elem.	0	281	352	438

Fallbrook Union High	0	181	164	108
Farmersville Elem.	0	41	0	0
Fillmore USD	0	0	260	268
Firebaugh-Las Deltas	0	133	185	151
Folsom Cordova USD	0	0	0	379
Fontana USD	0	0	1218	1300
Fountain Valley Elem.	0	259	288	318
Fowler USD	0	0	0	153
Franklin-McKinley Elem.	0	997	1443	1522
Fremont USD	0	850	960	1369
Fremont Union High	0	759	953	918
Fresno USD	1268	4111	5282	4913
Fullerton Elem.	0	627	852	958
Fullerton Jt. Union	0	767	1797	1910
Garden Grove USD	0	6750	6005	8759
Garvey Elem.	0	1101	1159	913
Gerber Union Elem.	0	20	0	38
Geyserville USD	0	12	14	29
Glendale USD	0	4799	6036	5644
Goieta Union Elem.	11	241	271	286
Gonzales Union Elem.	0	187	187	185
Gonzales Union High	0	45	68	0
Grant Jt. Union HSD	0	0	0	314
Greenfield Union Elem.	0	104	122	0
Gridley Union SD	0	0	0	117
Guadalupe Union Elem.	0	76	94	126
Hacienda-La Puenta	0	2522	2942	3026
Hamilton Un. Elem.	0	0	54	64
Hamilton Un. High SD	0	0	14	11
Harmony Union SD	0	0	0	24
Hawthorne Elem.	0	737	917	1098
Hayward USD	0	987	1196	1354
Heber Elem.	0	90	83	102
Hilmar USD	0	0	72	86
Holtville USD	0	146	187	187
Hueneme Elem.	0	258	302	429
Hughson Union SD	0	0	0	60
Humboldt	60	0	0	0
Huntington Beach HS	0	778	810	1067
Imperial USD	0	70	75	91
Inglewood USD	0	1208	1404	1765
Irvine USD	0	0	790	1289
Jefferson Elem.	0	730	640	614
Jefferson Union High	0	542	512	492
John Swett USD	0	0	0	107
Kerman USD	0	95	146	190
Kern	82	0	0	0
Keyes Union Elem.	3	0	0	0
Kings Canyon Jt. USD	0	367	505	725
Kings City Jt. U. HS	0	0	0	407
Kings City Union SD	0	0	0	279
Kings River Union Elem.	0	21	26	36

Kings River-Hardwick	0	0	15	17
Kirkwood Elem. SD	0	0	0	7
Knightsen Elem. SD	8	8	9	12
La Habra City Elem.	0	255	340	493
La Honda-Pescadero	0	0	14	40
La Mesa-Spring Vall	0	379	0	413
Laguna Salada Union	2	0	0	0
Lakeside Un. Elem. SD	0	0	44	39
Lamont Elem.	0	186	191	285
Laton USD	0	0	0	91
Lawndale Elem.	0	566	541	752
Le Grand Union HSD	0	111	199	71
Lennox School Dist.	6	1215	1365	1295
Liberty Un. High SD	0	0	100	46
Lincoln USD	0	336	0	0
Lindsay USD	0	197	249	302
Little Lake City SD	0	0	162	169
Livingston Un. Elem.	0	0	222	230
Livingston Un. High	0	313	0	0
Lodi USD	0	1761	1641	1848
Long Beach USD	0	5480	6262	7207
Los Angeles	7497	61648	65813	83131
Los Banos USD	0	147	227	206
Los Gatos-Saratoga	0	0	0	326
Los Nietos SD	0	0	92	136
Lost Hills Union Elem.	0	81	99	111
Luther Burbank Schl	2	32	26	0
Lynwood USD	0	1273	1834	2101
Madera USD	65	1172	1577	1688
Mammoth USD	0	0	43	47
Manchester Un. Elem.	0	0	7	0
Maple Elem.	0	9	0	0
Marin	93	0	0	0
Marysville Jt. USD	0	312	376	359
Maxwell USD	0	0	0	43
McFarland USD	0	121	151	239
Meadows Union SD	0	0	45	56
Mendota USD	0	0	134	153
Merced	601	0	0	0
Merced City Elem.	0	475	721	852
Merced Union High	0	420	641	743
Millbrae Elem	0	186	191	244
Milpitas USD	0	282	425	297
Modesto City Elem.	0	945	1263	1910
Monrovia USD	0	201	231	406
Montebello USD	0	2498	2890	3570
Monterey	139	0	0	0
Monterey Peninsula U	0	362	730	588
Moorpark USD	0	0	173	240
Moreland Elem.	0	271	220	272
Mountain View SD	0	0	74	0
Mt. Diablo USD	0	1203	947	1349

Mt. Pleasant SD	0	87	92	91
Mt. View-Los Altos	0	166	217	325
Mtn. View Elem.	3	725	820	933
Mtn. View Elem.	0	260	317	419
Napa Valley USD	0	374	391	481
National Elem.	0	525	641	810
New Haven USD	0	683	849	968
Newark USD	0	231	209	294
Newport-Mesa USD	0	1853	1497	1484
North City Jt. Union	0	55	33	25
Norwalk-La Mirada US	0	1481	1606	1803
Nuestro Elem. SD	0	0	3	6
Oak Grove Elem.	0	478	394	545
Oakland USD	0	2092	2825	2938
Ocean View Elem.	0	378	524	598
Ocean View Elem.	0	526	520	606
Oceanside City USD	0	771	910	1436
Ontario-Montclair Elem.	0	1182	1779	2585
Orange Center Elem.	0	0	19	24
Orange USD	3230	1131	1786	2292
Orchard Elem. SD	0	0	90	123
Orland Jt. Un. Elem.	0	0	69	83
Orland Jt. Un. High	0	0	21	23
Oro Grande Elem. SD	0	18	0	28
Oro Loma Elem.	0	26	26	35
Oroville City Elem.	0	89	0	0
Oxnard Elem.	0	1371	1456	1738
Oxnard Union High	0	341	333	343
Pajaro Valley USD	0	1514	1726	2026
Palm Springs USD	0	0	0	887
Palos Verdes Pen USD	0	678	499	782
Paralier USD	0	114	325	257
Paramount USD	0	940	1160	1422
Pasadena USD	0	1566	1749	2002
Paso Robles Jt. HSD	0	0	0	50
Paso Robles Union SD	0	0	0	141
Patterson Jt. USD	0	109	229	217
Pauma Elem.	0	23	43	0
Petaluma City Elem.	0	0	0	86
Petaluma Jt. U. HSD	0	0	0	243
Pierce Jt. USD	0	67	74	83
Pioneer Un. Elem. SD	0	0	33	19
Pittsburg USD	0	0	294	414
Placentia USD	0	1368	1258	829
Plumas Elem.	0	3	0	0
Pomona USD	0	1652	2240	3035
Ponway USD	0	0	640	1089
Porterville Elem.	0	310	404	404
Ravenswood City Elem	0	235	404	622
Redding Elem.	0	108	120	141
Redlands USD	0	455	756	966
Redwood City SD	0	0	836	935

Reef-Sunset USD	0	0	130	218
Rialto USD	0	282	0	445
Richgrove SD	0	0	63	0
Richland Elem.	0	271	239	226
Richmond USD	0	2011	2088	2240
Rio Elem.	0	136	171	157
Riverbank SD	0	0	0	127
Riverdale Jt. High	0	30	37	36
Riverdale Jt. Union	0	49	44	0
Riverside USD	566	1212	1455	1890
Romoland Elem. SD	0	0	0	74
Roseland Elem.	0	64	72	118
Rosemead USD	0	239	293	333
Rowland USD	0	1181	1437	1636
Sacramento City USD	825	1249	1229	1667
Saddleback Valley US	0	953	683	1058
Salida Union Elem.	0	43	143	0
Salinas City Elem.	0	352	429	482
Salinas Union High	0	465	416	584
San Ardo Union El.	0	0	0	16
San Benito High SD	0	0	182	0
San Bernardino USD	683	747	1878	2726
San Bruno Park Elem.	0	739	183	155
San Diego USD	413	2643	2786	2960
San Diequito Union	0	260	359	444
San Francisco USD	1403	12748	13657	11906
San Gabriel Elem.	0	329	426	488
San Joaquin	833	0	0	0
San Jose USD	0	1830	2539	3289
San Juan USD	0	0	0	526
San Juan Un. Elem.	0	0	35	0
San Leandro USD	14	197	218	307
San Lorenzo USD	0	196	567	706
San Lucas Union Elem	0	21	4	0
San Marcos USD	0	386	768	990
San Marino USD	0	238	237	265
San Mateo City Elem.	352	991	897	997
San Mateo Un. High	0	0	573	524
San Pasqual Un. SD	0	0	33	0
San Rafael City Elem	0	379	316	356
San Rafael City High	0	0	140	193
San Ysidro Elem.	0	529	541	644
Sanger USD	0	0	0	224
Santa Ana USD	0	4370	5275	4281
Santa Barbara Elem.	74	861	702	851
Santa Barbara High	0	0	597	731
Santa Clara USD	3636	845	859	1008
Santa Maria Elem.	0	382	0	0
Santa Maria Union Hi	0	291	252	387
Santa Maria-Bonita	0	0	475	524
Santa Monica-Malibu	0	426	468	504
Santa Paula Elem.	0	242	214	254

Santa Paula Un. High	0	0	86	88
Santa Rosa Elem.	0	218	353	412
Santa Rosa High	0	44	0	438
Santa Ynez Val. High	0	0	40	0
Selma USD	0	138	183	349
Semitropic SD	0	7	22	24
Sequoia Union High	0	474	730	779
Shaffer Union SD	0	0	0	13
Shasta	55	0	0	0
Shoreline USD	0	0	0	44
Sierra Sands Unified	2	0	0	0
Siskiyou	21	0	0	0
So. San Francisco USD	0	775	695	552
Solano	26	0	0	0
Somis Union Elem.	0	22	27	32
Sonoma	91	0	0	0
South Bay Union Elem.	9	0	0	0
South Bay Union Elem.	1	439	565	653
South Pasadena USD	0	361	303	318
South Whittier Elem.	0	234	349	458
Spreckles Union Elem.	0	16	0	0
Stanislaus	422	160	203	151
Stockton USD	0	2961	2778	2145
Strathmore U. HSD	0	0	0	18
Sunnyvale Elem.	0	332	376	433
Sunol Glen Elem.	0	8	0	0
Sweetwater Union HSD	0	1354	1878	1278
Tahoe-Truckee USD	0	0	267	245
Temple City USD	0	201	220	387
Terra Bella Union El	0	57	83	83
Thermalito Union El.	0	58	103	164
Torrance USD	1	1106	1288	1497
Tulare City Elem. SD	1094	0	224	395
Tulare Jt. Union Hig	0	182	226	246
Tustin USD	0	492	617	744
Ukiah USD	0	0	214	247
Union Elem.	0	133	154	154
Valle Lindo Elem.	0	32	45	66
Vallecitos SD	0	49	20	29
Valley Center Union	0	114	134	213
Ventura	110	0	0	624
Visalia USD	0	1134	1083	1378
Vista USD	0	745	1057	1491
Walnut Creek SD	0	0	0	156
Wasco Un. Elem. SD	0	0	157	220
Wasco Union High SD	0	0	0	90
Washington USD	0	393	481	711
Weaver Union Elem.	0	121	74	151
Weed Union Elem.	0	21	36	25
West Covina USD	0	367	233	354
West Fresno Elem.	0	34	41	102
West Park SD	0	0	0	21

Westminister Elem.	0	565	782	1149
Westmorland Union Elem.	0	26	31	0
Westside Elem.	0	56	103	0
Whisman Elem.	0	179	169	175
Whittier City SD	0	189	355	406
Whittier Union High	0	300	452	496
William S. Hart UH	8	0	0	0
Willow USD	15	0	77	83
Wilmar SD	0	18	25	24
Windsor Union SD	0	44	0	0
Woodlake Union Elem.	0	119	113	154
Woodlake Union High	0	26	36	48
Yolo	157	0	0	0
Yuba	183	0	0	0
Yuba City Unified	4	0	0	0
** Subtotal **				
	26128	226119	268455	318689
COLORADO				
Arickaree	0	4	5	0
Ault-Highland	0	0	0	40
Aurora #28	27	502	0	0
Brighton	0	0	0	119
Burlington	0	0	0	25
Denver Co# 1	157	1386	1329	1846
Gilcrest	0	0	0	53
Jefferson Co #1	38	0	0	0
North Park R1	0	0	11	0
Northglen #50	32	0	0	0
Sierra Grande	0	18	0	0
Westminister #12	77	0	0	0
** Subtotal **				
	331	1910	1345	2083
CONNECTICUT				
Bridgeport	301	892	877	732
Danbury	93	376	447	474
East Hartford/Manche	34	0	0	0
Hartford	95	1012	1171	1368
Meriden	29	0	0	0
Middletown	21	0	0	0
New Britain	79	0	381	321
New Haven/Hamden Con	31	0	0	0
Norwalk	83	0	332	363
Stafford Springs	22	0	0	0
Stamford	31	817	902	1156
Vernon	27	0	0	0
West Hartford/Bloomf	43	0	0	0
** Subtotal **				
	889	3097	4110	4414

DELAWARE				
Brandywine School	9	0	0	0
Christina School Dis	177	0	0	0
Colonial School Dist	3	0	0	0
Indian River School	11	0	0	0
Red Clay Consld Schl	83	0	0	0
** Subtotal **				
	283	0	0	0
DISTRICT OF COLUMBIA				
DC Public Schools	212	4470	5873	5674
Filmore Intl Center	0	10	0	0
G.A.P./Marie Reed	0	33	0	0
Sacred Heart	0	35	0	0
St. Thomas Apostle	0	5	0	0
Studio School	0	10	0	0
Washington Internatl	0	240	338	87
** Subtotal **				
	212	4803	6211	5761
FLORIDA				
Alachua	9	0	0	0
Bay	37	0	0	0
Brevard	18	0	0	0
Broward	62	1968	5402	4202
Dade	8945	19211	11080	11151
Duval	115	0	0	0
Escambia	71	0	0	0
Hardee	0	0	0	176
Hillsborough	152	0	0	0
Lee	125	0	812	879
Leon	10	0	0	0
Martin	180	0	0	0
Okeechobee	0	0	0	374
Orange	68	0	0	0
Osceola	9	0	0	0
Palm Beach	149	794	794	6458
Pinellas	210	605	609	653
Sarasota	24	0	0	0
Seminole	21	0	0	0
** Subtotal **				
	10205	22578	18697	23893
GEORGIA				
Atlantic Public Schl	66	0	0	0
Clayton County Schls	90	0	0	0
Cobb County Pub. Scl	139	0	500	793
Dekalb County School	145	961	1467	1744
Fulton County School	48	0	531	586

Gainesville	0	0	0	93
Gwinnett County	51	0	534	632
** Subtotal **	539	961	3032	3848
GUAM				
Guam Dept. of Educ.	0	0	0	621
** Subtotal **	0	0	0	621
HAWAII				
State Dept. of Educ.	208	3064	2913	2906
** Subtotal **	208	3064	2913	2906
IDAHO				
Bliss #234	0	0	0	11
Boise #1	57	0	0	0
Castleford #417	0	0	0	13
Glenns Ferry #192	0	0	0	27
Gooding #231	0	0	0	34
Hagerman #233	0	0	0	24
Homedale #370	0	0	0	37
Marsing #363	0	0	0	46
Meridian #2	8	0	0	0
Murtaugh #418	0	0	0	11
Twin Falls #411	21	0	0	0
Wendell #232	0	0	0	29
West Jefferson #253	0	0	0	23
Wilder #133	0	0	0	72
** Subtotal **	86	0	0	327
ILLINOIS				
Addison #4	0	104	144	151
Aurora East #131	0	266	327	0
Avoca #37	0	0	0	29
Bensenville #2	0	76	105	158
Bloom HS #202	0	0	0	109
Blue Island #130	23	126	132	135
CHSD (W. Chicago)#94	0	0	73	160
Chicago #299	2473	15834	25109	26723
Cicero #99	31	349	480	627
Com. Consol. #34	0	0	93	0
DeKalb #428	0	237	264	143
Des Plaines #62	0	0	0	167
Du Page #88	55	0	0	0
East Aurora #131	0	0	0	520
East Maine #63	0	0	228	470
East Moline #63	0	495	0	0
Elgin #46	91	787	904	1021
Evanston Twshp #202	0	0	100	0

Hawthorn #73	0	0	0	110
Highland Park #107	0	0	40	0
Highwood #111	0	77	84	104
Leyden Twshp #212	0	0	0	126
Maine Twshp #207	0	0	226	200
Morton #201	0	0	0	185
Mt. Prospect #57	0	0	0	58
Mundelein HS #120	0	0	32	0
NSSEO	0	0	0	33
Niles Township #219	0	129	182	222
North Berwyn #100	0	66	65	51
Peoria #150	60	0	0	0
Rhodes #84.5	0	0	137	0
River Trails #26	0	0	94	0
Rockford #205	170	0	0	0
Skokie #68	0	52	120	174
Skokie #69	0	77	115	134
Skokie #73.5	0	0	63	39
South Berwyn #100	58	58	56	0
Springfield #186	104	0	0	0
Union Ridge #86	0	0	30	22
Urbana #116	42	0	0	0
Waukegan #60	50	1028	992	949
West Chicago #33	0	80	115	198
Westmont #201	0	221	103	85
Wheaton #200	112	426	514	0
Wheaton #200	0	0	0	554
Wood Dale #7	0	34	38	42
** Subtotal **	3269	20522	30965	33699
INDIANA				
Fort Wayne Community	22	0	0	0
Indianapolis Pub. Sc	21	0	0	0
South Bend Comm. Scl	66	0	0	0
** Subtotal **	109	0	0	0
IOWA				
Cedar Rapids Comm.	98	0	0	0
Columbus	0	0	49	78
Davenport Comm. Schl	44	0	0	0
Desmoines Pub. Schls	274	0	502	0
Sioux City Comm.	66	0	0	0
Storm Lake	0	0	47	80
West Liberty	0	0	41	95
** Subtotal **	482	0	639	253
KANSAS				
Dodge City USD 443	0	0	0	653
Emporia USD #253	28	0	0	0

Garden Cty #457	128	0	198	222
Goessel #411	1	0	0	0
Hays #489	18	0	0	0
Kansas City #500	90	0	0	0
Kismet Plains 483	0	0	42	40
Leavenworth #453	69	0	141	0
Liberal USD #480	27	182	147	168
Moscow USD 209	0	0	0	9
Olathe #233	18	0	0	0
Wichita USD #259	704	707	705	813
Winfield #465	2	0	0	0
** Subtotal **	1085	889	1233	1905
KENTUCKY				
Fayette County	28	0	0	0
Jefferson County	177	0	0	0
** Subtotal **	205	0	0	0
LOUISIANA				
Caddo	67	0	0	0
East Baton Rouge	31	0	672	508
Iberia	21	0	0	0
Jefferson Parish	154	1084	1286	1160
Lafayette	24	0	0	0
Lafourche Parish	21	0	0	0
Orleans Parish	686	1785	1792	1693
Rapides Parish	57	0	0	0
** Subtotal **	1061	2869	3750	3361
MAINE				
Brunswick	22	0	0	0
MSAD 60-NO. Berwick	33	0	0	0
Portland Pub. Schools	90	0	0	257
Sanford Pub. Schools	32	0	0	0
** Subtotal **	177	0	0	257
MARYLAND				
Ann Arundel Pub Schl	24	0	0	0
Baltimore County	73	1082	820	1292
Charles County	23	0	0	0
Frederick County	20	0	0	0
Howard County	21	0	0	0
Montgomery County	185	3703	3969	4838
Prince George's County	125	4782	5376	5939
Washington County	22	0	0	0
** Subtotal **	493	9567	10165	12069

MASSACHUSETTS				
Acton	0	110	127	86
Acton-Boxborough	0	63	65	59
Amherst	38	0	95	136
Attleboro	51	0	0	0
Berkshire Hills Regl	23	0	0	0
Boston	901	3718	3906	3,339
Brockton	54	0	681	675
Brookline	101	222	385	478
Cambridge	76	1815	1603	1,517
Chelsea	238	500	589	724
Chicopee	30	0	0	0
Concord-Carlisle	0	27	20	0
Everett	29	0	0	0
Fall River	215	917	965	1,114
Fitchburg	78	150	305	252
Framingham	24	0	259	369
Holyoke	29	0	0	0
Lawrence	185	1217	1332	1,408
Lowell	368	1691	1387	1,109
Lowell Regional Tech	24	0	0	0
Lynn	388	773	840	817
Malden	103	240	434	512
Medford	47	231	269	231
Methuen	21	0	0	0
New Bedford	0	481	430	436
Newton	123	533	680	843
Quincy	72	322	273	362
Revere	557	592	289	263
Salem	0	0	180	202
Sommerville	33	627	674	647
Springfield	206	0	0	600
Waltham	24	190	243	220
Watertown	0	98	108	132
West Springfield	83	0	0	0
Westfield	23	0	0	122
Worcester	574	907	789	691
** Subtotal **				
	4718	15424	16928	17344
MICHIGAN				
Berkley	21	0	0	0
Berrien Springs	0	0	0	196
Dearborn	0	1173	755	1018
Detroit	263	837	552	586
Godfrey-Lee	50	0	0	0
Grand Rapids	466	863	0	512
Hamtramck	125	470	606	593
Holland	44	0	0	0
Lansing	91	0	0	0
Macomb ISD	45	0	0	0
Saginaw	26	0	0	0

Van Dyke	30	0	0	0
West Bloomfield	30	153	0	0
** Subtotal **	1191	3496	1913	2905
MINNESOTA				
Austin Public School	23	0	0	0
Bloomington Pub. Sch	70	0	0	0
Hopkins School Dist.	24	0	0	0
Jackson Public Scls	23	0	0	0
Magnolia	0	0	0	9
Minneapolis Pub. Sch	588	908	1242	994
Moorhead	0	0	0	64
Morris Area Schools	21	0	0	0
Osseo Area Schools	63	0	0	0
Pipestone	25	0	0	0
Robbinsdale Area Sch	40	0	0	0
Rochester	155	0	0	0
Rosemount/Apple Vall	39	0	0	0
St. Cloud Pub. Sch.	76	0	0	0
St. Paul Pub. School	1057	1472	1648	1729
Worthington Pub Sch	49	0	0	79
** Subtotal **	2253	2380	2890	2875
MISSISSIPPI				
Biloxi	25	0	0	0
** Subtotal **	25	0	0	0
MISSOURI				
Kansas City Pub Schl	43	0	0	552
Springfield R-XI Sch	33	0	0	0
St. Louis Pub. Schls	312	648	1079	1012
Union R-XI School	28	0	0	0
** Subtotal **	416	648	1079	1564
MONTANA				
Billings	0	0	11	0
Missoula County High	21	0	37	35
Missoula/Hellgate	20	0	56	71
** Subtotal **	41	0	104	106
NEBRASKA				
Grand Island	22	0	0	0
Lancaster Co. No.555	47	47	0	0
Omaha Pub. Schools	334	0	0	0
South Sioux City Sch	35	0	0	0
** Subtotal **	438	47	0	0

NEVADA				
Carson City-Ineligble	6	0	0	0
Clark County	97	0	0	0
Washoe Cnty School	64	0	0	0
** Subtotal **				
	167	0	0	0
NEW HAMPSHIRE				
Manchester	33	0	0	0
Nashua	31	0	0	0
** Subtotal **				
	64	0	0	0
NEW JERSEY				
Allendale	0	0	23	29
Belleville	0	0	114	134
Bergenfield	0	274	230	198
Bound Brook	0	0	104	106
Brigantine	0	0	27	30
Camden City	62	0	0	0
Carlstadt	0	18	0	13
Cherry Hill	0	0	0	302
Cliffside Park	0	152	231	210
Clifton 0900	72	0	0	0
Demarest	0	0	0	46
Dover	0	0	137	0
Dumont	0	0	0	128
Dunellen	0	0	0	29
East Brunswick	0	0	0	244
East Newark	0	20	33	38
East Rutherford	0	0	24	40
Edgewater	0	15	15	16
Edison	23	461	494	572
Egg Harbor TWP	31	0	0	0
Elizabeth 1320	23	1153	1235	1444
Englewood	0	183	195	243
Englewood Cliffs	0	18	14	13
Fair Lawn	0	0	115	296
Fairview	0	0	122	83
Fort Lee	24	206	214	302
Freehold Boro	0	0	0	28
Garfield	0	113	176	252
Glen Rock	0	58	53	56
Guttenberg	0	59	59	0
Hackensack	0	0	189	220
Harrison	0	0	201	250
Haworth	0	12	13	19
Highland Park	0	72	85	59
Howell	20	0	0	0
Hudson Co. Voc. Tech	0	11	0	0

Irvington	0	0	265	0
Jersey City	84	1554	1975	2241
Kearny	0	204	337	410
Leonia	0	0	56	123
Linden	0	0	129	156
Little Ferry	0	26	0	69
Lodi	0	113	140	156
Long Branch	0	169	0	185
Metuchen	0	0	0	51
Middlex	0	0	0	458
Midland Park	0	0	0	31
New Brunswick	0	302	368	435
Newark	457	2365	2770	2842
North Arlington	0	0	44	56
North Bergen	0	376	436	474
North Plainfield	0	0	143	186
Northern Valley Reg.	0	0	0	113
Northfield	0	0	0	20
Northvale	0	58	0	0
Norwood	0	0	16	16
Orange	0	181	183	237
Palisades Park	0	0	0	311
Paramus	0	0	194	178
Park Ridge	0	0	34	32
Parsipanny-Troy Hill	0	0	184	253
Passaic City	0	2120	2023	1074
Paterson	0	1286	1993	1973
Perth Amboy	0	368	461	0
Piscataway	0	231	268	211
Plainfield	0	217	0	267
Princeton	0	0	0	173
Prospect Park	0	29	34	42
Red Bank Boro	0	0	0	26
Ridgefield Park	0	0	0	57
River Edge	0	30	39	0
Roselle	0	103	88	124
Roselle Park	0	67	80	101
Rutherford	0	96	88	101
S. Plainfield 4910	20	0	0	0
South Hackensack	0	0	9	0
South Orange-Maplewd	0	0	0	147
South River	0	98	0	181
Summit	0	0	0	75
Teaneck	0	0	127	136
Union City	0	1065	1104	1300
Wallington	0	61	80	72
Weehawken	0	0	121	97
West New York	0	531	533	703
** Subtotal **	816	14475	18425	21293

NEW MEXICO				
Albuqerque Pub. Schools	0	1471	1593	2820
Deming Pub. Schools	0	149	257	309
Dexter Consolidated	0	0	270	0
Floyd Municipal Schools	0	18	0	0
Gadsden Independent	0	717	849	903
Hatch Valley Municipal	0	144	151	184
Hondo Valley	0	0	0	12
House Municipal Schools	0	13	6	7
** Subtotal **	0	2512	3126	4235
NEW YORK				
Amagansett	0	0	0	3
Amityville	0	125	120	158
Ardsley	0	0	121	150
Bedford	0	0	0	159
Binghamton	0	0	0	213
Brentwood	20	533	657	0
Brighton	0	0	0	275
Buffalo	542	0	527	504
Byram Hills	0	48	58	0
CSD 01	10	591	861	730
CSD 02	2	713	1234	2063
CSD 03	0	580	389	514
CSD 04	0	215	544	451
CSD 05	0	195	925	721
CSD 06	4	2015	3213	2786
CSD 07	0	380	650	524
CSD 08	0	486	872	861
CSD 09	0	1746	2467	2404
CSD 10	0	1475	3380	3708
CSD 11	56	1035	1855	2125
CSD 12	0	412	1116	1288
CSD 13	5	362	394	644
CSD 14	38	781	1410	1500
CSD 15	0	568	1382	1663
CSD 16	0	65	58	134
CSD 17	0	2854	2729	3320
CSD 18	32	1715	2065	2520
CSD 19	1	1047	1549	1279
CSD 20	143	1000	3608	4084
CSD 21	399	1487	3422	3993
CSD 22	106	2127	2917	3350
CSD 23	0	272	308	343
CSD 24	70	2782	6550	5172
CSD 25	39	2034	3160	3405
CSD 26	16	787	1059	1053
CSD 27	31	1750	2836	3064
CSD 28	76	2512	4492	4582
CSD 29	0	1206	3152	2843
CSD 30	88	2217	4144	4683

CSD 31	0	500	1149	1089
CSD 32	0	570	1402	1261
CSD 33	0	0	88	24
Central Islip	28	225	224	236
Copiague	0	0	126	170
Div. of Special Educ	0	980	1565	553
Division High School	216	9428	23649	30829
Dobbs Ferry	0	0	0	40
East Hampton	0	0	0	77
East Ramapo	62	553	563	623
Ellenville	0	0	61	0
Elmont	0	0	0	131
Freeport	0	339	424	436
Glen Cove	0	131	149	141
Great Neck	18	157	0	0
Hempstead	0	410	524	545
Hewlett-Woodmere	0	0	79	92
Hicksville	0	0	190	195
Huntington	0	190	151	182
Ithaca	83	0	0	393
Jericho	0	0	0	64
Johnson City	20	0	0	0
Lindenhurst	24	0	0	190
Long Beach	0	242	545	545
Lyme	0	0	0	12
Middle County	31	0	0	0
Mineola	0	154	192	220
Monroe I Boces	44	0	0	0
Mount Vernon	0	948	1296	1324
New Rochelle	0	0	488	560
Newburgh	0	0	407	341
Nyack	0	198	132	152
Ossining	0	147	147	149
Oyster Bay-East Nor	0	0	0	51
Pearl River	0	54	49	0
Plainview-Old Bethpa	0	123	0	0
Port Chester-Rye	0	261	337	309
Port Washington	0	246	270	284
Roosevelt	0	118	138	104
Roslyn	0	0	84	73
Rye Neck	0	98	49	76
Sachem	20	0	0	0
South Orangetown	0	0	66	0
Springs	0	0	13	0
Suffolk Boces 2	72	0	0	0
Suffolk Boces III	99	0	0	0
Sweet Home	0	0	0	121
Syosset	0	160	155	161
Syracuse	155	0	0	511
Tarrytowns	0	148	311	0
Utica	87	0	248	372
Westbury	0	114	398	374

White Plains	0	0	0	307
Wyandanch	0	0	0	83
Yonkers	114	743	876	978
** Subtotal **				
	2751	53352	100769	111647
NORTH CAROLINA				
Forsyth #340	28	0	0	0
Gaston County Schls	21	0	0	0
Greensboro Cty #411	64	0	0	0
High Point #412	23	0	0	0
Mecklenburg Co #600	85	0	0	0
Wake Co. Schls #920	46	0	0	0
** Subtotal **				
	267	0	0	0
NORTH DAKOTA				
Fargo	50	0	0	315
** Subtotal **				
	50	0	0	315
OHIO				
Akron Public Schools	155	0	0	0
Cleveland Heights	43	0	0	0
Cleveland Pub School	111	680	749	784
Columbus City School	550	1050	696	644
Lakewood City School	22	0	0	0
Parma City Schools	30	0	0	0
Toledo Pub Schools	56	0	0	0
Youngstown City Schl	25	0	0	0
** Subtotal **				
	992	1730	1445	1428
OKLAHOMA				
Moore Public Sch	24	0	0	0
Oklahoma City I-89	229	541	678	733
Pioneer-Pleasant Val	33	0	0	0
Stillwater Pub. Schl	22	0	0	0
Tulsa Independent Sc	31	0	0	0
** Subtotal **				
	339	541	678	733
OREGON				
Annex #29	0	0	3	0
Beaverton #48J	50	0	0	500
Brooks 31	0	0	4	0
Buena Crest #134	0	0	5	0
Butte Creek #67	0	0	0	10
Canby Elem. Dist. #8	0	89	0	76
Chenowith #19	0	0	31	0
Culver #4	0	0	0	13
Eldriedge #60	0	0	16	22
Forest Grove #15	0	0	0	156

Gervais Dist. #76	0	11	18	35
Harney County #16	0	0	0	4
Harrisburg #5-J	0	0	6	0
Hillsboro Dist. 3JT	28	0	0	327
Hillsboro Elem. #7	0	0	0	237
Irish Bend Sch Dist.	32	0	0	0
Jefferson Cnty 509J	0	220	241	247
Jordan Valley #1	0	4	0	0
Molalla Elem. #35	0	0	0	49
Monument Schools	0	7	5	0
Mt Angel School #91	0	28	19	23
Ninety-One Elem.	0	0	0	17
North Howell #51	0	0	2	3
North Marion #15	0	0	0	52
Ophir #12	0	0	0	4
Phoenix-Talent #4	0	0	0	87
Portland Pub Sch #1	369	834	1336	1756
Sauvie Island #19	0	0	2	0
Springfield Dist. #19	26	0	0	0
Stanfield #61	0	0	23	25
Wasco #12	0	0	126	0
Woodburn Schl #103C	0	193	394	341
Wyatt 63J	0	0	2	0
** Subtotal **				
	505	1386	2233	3984
PENNSYLVANIA				
Conestoga Valley	20	0	0	0
Erie School District	51	0	0	0
Harrisburg City Schl	23	0	0	0
Lancaster I.U.-13	41	0	0	0
Lancaster Lebanon 13	39	0	0	0
Luzerne Inter. #18	52	0	0	0
Philadelphia	998	3173	3635	4242
Pittsburgh	22	0	0	0
Reading School Dist.	32	0	0	0
Upper Darby	81	0	0	0
** Subtotal **				
	1359	3173	3635	4242
PUERTO RICO				
Puerto Rico	0	2087	0	2267
** Subtotal **				
	0	2087	0	2267
RHODE ISLAND				
Central Falls	0	186	212	223
Cranston	45	0	0	0
Pawtucket	0	386	515	545

Providence	1410	5512	6288	6495
Woonscoket	63	0	0	0
** Subtotal **	1518	6084	7015	7263
SOUTH DAKOTA				
Sioux Falls	23	0	0	0
** Subtotal **	23	0	0	0
TENNESSEE				
Memphis City Schools	390	672	620	575
Metro. Nashville PS	452	736	901	658
Rutherford Co BD ED	70	0	0	0
** Subtotal **	912	1408	1521	1233
TEXAS				
Aldine ISD	21	608	0	1243
Alief ISD	0	1605	1795	654
Alvin ISD	21	0	0	0
Amarillo ISD	34	0	0	0
Arlington ISD	0	0	0	513
Austin ISD	77	805	1050	1243
Avalon ISD	0	0	0	13
Birdville ISD	32	0	0	0
Brownfield CISD	26	0	0	0
Brownsville ISD	0	4500	4484	1272
Buena Vista ISD	0	0	6	0
Canutillo ISD	0	313	395	234
Carrollton-Farmers	90	0	0	0
Clear Creek ISD	108	0	0	0
Clint ISD	0	124	216	213
College Station ISD	0	223	256	224
Conroe ISD	39	0	0	0
Cypress-Fairbanks	39	0	0	0
Dallas ISD	395	1902	2811	938
Dell City ISD	0	12	0	0
Donna ISD	0	457	543	688
Eagle Pass ISD	0	568	609	645
Ector County ISD	54	541	510	0
Edcouch-Elsa ISD	0	251	260	171
Edinburg ISD	0	780	1069	1047
El Paso ISD	0	2751	6092	3994
Era ISD	0	0	15	0
Fabens ISD	0	0	172	193
Forestburg ISD	0	5	7	0
Fort Bend ISD	71	0	0	0
Fort Hancock ISD	30	0	45	49
Fort Worth ISD	261	1540	1531	1563
Galena Park ISD	38	0	0	0
Garland ISD	159	0	0	0

Glasscock ISD	0	64	0	0
Grand Prairie ISD	38	0	0	0
Granger ISD	0	0	10	0
Harlingen CISD	32	0	0	0
Hidalgo ISD	0	348	0	288
Houston ISD	290	6317	8933	7569
Huckabay ISD	0	0	28	12
Humble ISD	35	0	0	0
Hurst-Fules-Bedford	53	0	0	0
Irving ISD	39	852	1025	1200
Katy ISD	43	0	0	0
Keene ISD	0	0	46	0
Keller ISD	21	0	0	0
Klein ISD	83	0	0	0
La Feria ISD	0	0	76	83
La Joya ISD	0	1102	922	514
La Villa ISD	0	0	29	28
Laredo ISD	0	982	1171	1578
Lasara ISD	0	0	40	37
Lingleville ISD	0	0	6	0
Loop ISD	0	0	15	0
Los Fresnos ISD	0	147	0	221
Lufkin ISD	62	0	0	0
Martinsville ISD	0	0	10	0
McAllen ISD	0	1482	1677	2040
McGregor ISD	0	0	43	0
Memphis ISD	0	0	22	0
Mercedes ISD	0	163	221	251
Mission CISD	0	743	433	687
Mobeetie ISD	0	4	0	0
Monte Alto ISD	0	0	28	0
Mt. Pleasant ISD	0	0	136	0
Nixon-Smiley ISD	0	36	92	0
North East ISD	29	0	0	0
Pasadena ISD	89	660	899	1248
Pharr-San Juan ISD	0	1101	1267	991
Point Isabel ISD	0	0	140	125
Presidio ISD	0	88	88	117
Progreso ISD	0	157	199	146
Raymondville ISD	0	118	0	0
Rio Grande ISD	0	1028	1453	661
Rio Hondo ISD	0	0	159	110
Roma ISD	0	444	470	454
San Antonio ISD	63	0	531	2464
San Benito CISD	0	0	457	397
San Elizario ISD	0	356	0	0
San Felipe ISD	0	471	0	500
San Isidro ISD	0	0	13	18
Santa Maria ISD	0	0	0	31
Santa Rosa ISD	0	0	64	39
Seminol ISD	0	75	0	0
Sharyland ISD	0	196	0	255

Socorro ISD	0	646	0	852
Spring Branch ISD	272	1014	1562	1040
Sulphur Bluff ISD	0	0	0	11
Three Way ISD	0	15	10	0
Three Way ISD (009)	0	0	4	3
Tornillo ISD	0	0	0	112
United ISD	0	328	499	611
Valley View ISD	0	258	486	62
Venus ISD	0	0	0	25
Waka ISD	0	0	3	0
Webb CISD	0	0	13	22
Weslaco ISD	0	0	584	574
West Texas Child ISD	0	0	23	0
Winfield ISD	0	0	0	3
Ysleta ISD	0	1648	2210	1837
Zapata CISD	0	122	0	0
** Subtotal **				
	2644	37950	47963	42113
UTAH				
Alpine School Dist.	96	0	0	77
Cache School Dist.	2	12	30	0
Davis School Dist.	0	735	903	908
Granite School Dist.	73	73	4345	4906
Jordan School Dist.	64	0	0	0
Logan	0	0	16	83
Millard School Dist.	3	10	0	0
Murray School Dist.	15	0	0	50
Nebo	0	0	0	96
Ogden School Dist.	45	400	450	410
Salt Lake City	156	519	599	653
Tooele	0	0	30	0
Uintah	0	0	3	0
Weber School Dist.	5	0	0	46
** Subtotal **				
	459	1749	6376	7229
VERMONT				
Chittenden Central	20	0	0	0
** Subtotal **				
	20	0	0	0
VIRGINIA				
Alexandria 101	57	606	731	765
Arlington	349	4489	4353	4549
Chesterfield 021	29	73	0	0
Chesterfield/021	29	73	0	0
Fairfax Co PS 029	686	4923	4716	4801
Falls Church	0	0	0	48
Hampton	65	0	0	0
Henrico Co PS 029	290	0	0	546

Loudoun Co PS 053	22	0	0	0
Manassas City School	21	0	0	152
Newport News PS	29	0	0	0
Norfolk PS 118	37	0	0	0
Prince Williams	66	0	0	0
Richmond City 123	35	0	0	0
Roanoke City PS 124	52	0	0	0
Virginia Beach	41	0	0	0
** Subtotal **	1808	10164	9800	10861
WASHINGTON				
Bellevue School Dist.	166	0	0	857
Brewster School Dist	0	39	0	84
Bridgeport School	0	53	73	70
Cascade	0	0	0	49
Edmonds School D. 15	39	0	0	524
Entiat	0	0	9	9
Everett #2	86	0	0	0
Evergreen SD #114	60	0	0	467
Federal Way SD	32	0	500	502
Granger	0	0	64	102
Highline SD	183	492	512	637
Index	0	0	0	1
Kennewick SD #17	23	0	0	0
Kent School Dis. 415	53	0	0	0
Lake Chelan School	0	45	70	80
Lake Washington SD	35	0	0	0
Mabton	0	0	0	87
Manson School Dist.	0	27	30	109
Nooksack Valley	0	0	0	57
North Franklin Schl	0	208	240	271
Olympia	50	0	0	0
Orondo	0	0	0	36
Othello	0	0	245	156
Palisades	0	0	11	17
Pasco School Dist.	0	524	736	808
Pateros	0	0	19	20
Prescott	0	0	0	11
Prosser	0	0	93	115
Pullman	0	0	152	0
Raymond	0	0	0	41
Riverview Carn. Elem	29	0	0	0
Royal	0	0	0	43
Seattle School Dist.	805	3758	3693	4050
Soap Lake	0	0	0	22
South Central PS	29	0	0	83
Sunnyside	0	0	198	271
Tacoma Public School	987	1164	1330	1500
Trout Lake	0	0	6	0
Union Gap	0	0	20	19

Vancouver SD #37	74	0	0	0
Yakima School Dist.	0	1635	1622	1634
** Subtotal **	2651	7945	9623	12732
WISCONSIN				
Appleton	60	0	0	0
Beloit	22	0	0	0
Eau Claire	129	0	0	0
Fond Du Lac	22	0	0	0
LaCrosse	175	0	436	373
Ladysmith-Hawkins	20	0	0	0
Madison	114	0	0	0
Manitowoc	59	0	0	0
Milwaukee	411	0	986	1106
Nekoosa	26	0	0	0
Oshkosh	159	0	308	0
Sheboygan	91	0	0	0
Wausau	0	0	327	0
Wisconsin Rapids	68	0	0	0
** Subtotal **	1356	0	2057	1479
*** Total ***	74229	472098	600565	685586

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